

**Before the
Federal Communications Commission
Washington, D.C.**

In the Matter of)	
)	
)	
Schools and Libraries)	WC Docket No. 02-6
Universal Service Support Mechanism)	
)	
Request for Waiver by)	Application No. 181034007
Grand Canyon Unified School District)	
of the Commission's Rules)	

**REQUEST FOR WAIVER OF
SERVICE IMPLEMENTATION DEADLINE
FOR FUNDING YEAR 2018**

Pursuant to sections 1.3 and 54.719(c) of the Federal Communications Commission's rules,¹ the Grand Canyon Unified School District ("GCUSD") respectfully requests a waiver of section 54.507 of the Commission's rules and the June 30, 2019 implementation deadline for the 2018 funding year for the above-captioned application. For the reasons set forth below, the GCUSD requests that the Wireline Competition Bureau grant this waiver, and any other waivers as may be necessary, to enable the GCUSD to complete special construction within 18 months and receive its previously approved E-rate funding for this much needed project.

I. BACKGROUND

Located in Grand Canyon Village, the GCUSD is the only unified (K-12) school district in the country located within a national park. The school district serves an extremely diversified K through 12 student body. Of its approximately 300 students, nearly 60 percent qualify for the free or reduced federal school lunch program. Approximately 30 percent of its students are Native Americans, another 30 percent are Hispanic. Many of the students are of children of park

¹ 47 C.F.R. §§ 1.3 & 54.719(c).

service employees or children of residents of the nearby Town of Tusayan. Due to its rural and remote location, the school has woefully inadequate internet service consisting of seven bonded copper T-1 lines that purportedly provide 10.5 Mbps of capacity. In reality, speeds seldom exceed 6 Mbps. The lack of reasonable internet access precludes virtually any ability to utilize modern educational tools and severely disadvantages the school district's students.

II. Actions to Obtain Funding and An Extension of Time

On January 16, 2018, the GCUSD issued a request for proposals to provide broadband and voice services and it filed the Form 470 two days later.² The school district received bids from Commnet AZ, LLC ("Commnet") and Sun Corridor. The GCUSD chose Commnet because Sun Corridor did not have the requisite existing fiber connections. Commnet proposed to provide a bundled, single provider solution consisting of transport and internet service to the school's demarcation point. Consistent with the RFP, Commnet proposed recurring monthly pricing for high-speed internet service between 50 Mbps and 1 Gbps. Commnet's proposal was contingent on being awarded funding for a special construction project consisting of a 66.6 mile fiber route between the school and Williams, Arizona, where it would connect with existing fiber. The proposed route runs through national forest and national park land, as well as through Williams and Tusayan.³ Commnet stated the total eligible cost of the special construction at \$5,660,200.37.

The school district awarded the contract to Commnet on March 17, 2018. Shortly thereafter, recognizing the dire need for high-speed internet services for the school, the Arizona

² See Exhibit 1. FCC Form 470 – Funding Year 2018 (Dated Jan. 18, 2018).

³ See Exhibit 2. GCUSD Project Overview Map.

State Department of Education approved 10 percent state matching funding of \$566,020.04 for Commnet's construction of the fiber route as set forth in its bid.⁴

The school district filed its E-rate application on March 22, 2018.⁵ The application sought funding for a lit fiber service to provide 200 Mbps symmetric broadband service, including \$5,094,180.33 for special construction funding for the fiber route and \$28,800 (applying an 80 percent discount) in recurring costs for the funding year. The 471 Form included excerpts from Commnet's proposal (Exh. 4 at page 3, referencing GCUSD_Commnet_IA_18-23_CS.pdf).⁶ The excerpts included Commnet's projected two-year timeline to complete the nearly 67 mile long fiber route, including an estimated nine months to complete necessary permitting with numerous private entities and federal agencies, and eleven months for make-ready work and construction. Assuming approval of funding by July 1, 2018, Commnet projected completion of the project by June 20, 2020.

Six months after submitting the application, USAC, on September 25, 2018, initiated a Program Integrity Review ("PIA") to which the GCUSD timely responded on October 10th and 11th of 2018. USAC sought information on issues such as whether alternative routes had been considered and whether any unique construction barriers inflated per foot costs. USAC did not raise questions about the construction timeline. The GCUSD did, however, provide in response to USAC's request for service provider documentation supporting the funding request the entire Commnet proposal, again reflecting the two-year construction timeline.⁷

⁴ See Exhibit 3. Arizona Department of Education, State Matching Funding Request.

⁵ See Exhibit 4. Form 471, Application Number 181034007.

⁶ See Exhibit 5. Commnet PDF.

⁷ See Exhibit 6. Commnet February 23, 2018 proposal in response to the RFP, at p. 24.

USAC ultimately approved the application, but not until January 3, 2019.⁸ On February 19, 2019, GCUSD filed a Form 500 request for a one-year extension, until June 30, 2020, to complete the project and light the fiber. The Form 500 again provided to USAC Commnet's proposal with the projected time line for completion of the project.⁹ USAC posed several questions regarding the need for the extension and particularly the circumstances beyond the service provider's control that would warrant an extension. The school district responded on February 23, 2019.¹⁰ The response noted the 24-month projected timeline necessitated by the length of the build, the remoteness of the area, and the numerous entities required to grant permits. It also noted that the funding had not been approved until January 2019 and that Commnet would not begin work until funding had been approved.

USAC denied the request for an extension on March 20, 2019.¹¹ USAC stated that "[p]er the FCC decision in the Second E-Rate Modernization Order, applicants may receive up to a one-year extension to complete special construction and use the fiber if they can demonstrate that construction was unavoidably delayed. This FCC rule does not allow approval for the reason submitted."

The school district filed an appeal of the denial on April 17, 2019.¹² The appeal emphasized the late approval of the application and cited USAC's guidance regarding requests for an extension, which includes late funding approval as one reason for granting an extension. Hearing nothing regarding the status of the appeal, the school district and Town of Tusayan held a conference call with USAC staff on June 4, 2019. During that call, the school emphasized the desperate need for the project and again noted the late funding approval. USAC staff requested

⁸ See Exhibit 7. Funding Commitment Decision Letter, Funding Year 2018.

⁹ See Exhibit 8. Form 500 Funding Commitment Adjustment Request Form.

¹⁰ See Exhibit 9. E-Rate Information Request.

¹¹ See Exhibit 10. Revised Funding Commitment Decision Letter.

¹² See Exhibit 11. Appeal.

further information regarding the unavoidable delays that prevented installation by the end of the 2018 funding year, that is, by June, 30, 2019. The GCUSD responded by letter on June 7, 2019, describing a number of causes that have been delaying the project, including a shutdown of the Federal Government that delayed efforts to obtain necessary permits from federal agencies, a series of acting Grand Canyon superintendents that hampered discussion with the park, severe weather events, and the late funding commitment.¹³

USAC denied the appeal on July 24, 2019.¹⁴ USAC stated that “[a]lthough your appeal stated that you experienced extreme weather events during the winter and spring, your appeal failed to provide the information necessary to grant a one-year extension. The two-year term of your build is not an unavoidable delay for meeting the June 30 service delivery deadline, as the size and complexity of the build was known. Therefore, your appeal is denied.”

III. Granting the Waiver for Funding Year 2018 Is in the Public Interest

A. The Need for Improved Internet Access Is Clear

Located only a short distance from the south rim of the Grand Canyon, the GCUSD is the only school district in the country located in a National Park. The campus consists of a high school, an elementary school and administrative buildings. Its roughly 300 students include Native Americans from nearby tribal areas, including the Havasupai, Navaho, Hopi and Tohono O’Odham and as well as Hispanic and other minorities. Only about a quarter of its students are white. And, as noted, nearly 60 percent qualify for the federal student lunch program.

Due to its remote location, the school district is currently unable to obtain reasonable high speed internet services. The bonded T1s that currently serve the school provide a theoretical maximum speed of 10.5 Mbps, which, even if achieved, affords an average per student bandwidth of about 35 Kbps, nearly

¹³ See Exhibit 12. June 6, 2019 Letter to USAC (“*GCUSD June 6, 2019 Letter*”). The letter is dated June 6 but was filed on June 7, 2019.

¹⁴ See Exhibit 13. Revised Funding Commitment Decision Letter, July 24, 2019 (“*July 24, 2019 RFCDL*”).

1/30th below the Commission's stated goal of 1 Mbps per student.¹⁵ Moreover, this bandwidth is shared between the school's educational and administrative functions. For this woefully inadequate internet access, the school pays \$43,000 per year or about \$4000 per Mb, which is 100 times the national average. The closest internet service with any bandwidth to speak of is in the town of Williams, more than 60 miles south of the school district. The existing fiber that runs through Williams will be connected to the planned fiber that would run from the town north to the school.

The lack of bandwidth places GCUSD's students at a distinct disadvantage. Modern teaching tools that require broadband internet access are practically unavailable. Just one specific example of the disadvantage by the school's inadequate internet access relates to required standardized testing. The tests are intended to be taken online, but the school's current internet access is insufficient. Students instead must take the tests on paper (or be bused to another school district). The state, however, requires paper tests to be taken a month before the on-line tests, depriving the students of the additional month of preparation time that is available for virtually all other students in the state. As noted, the Arizona State Department of Education recognized the urgency of the project and committed to match 10 percent of the special construction costs as set forth in Commnet's bid.

B. Waiver of the Commission's Rule Is Needed Because the Project Could Not Have Been Completed in One Year

The Commission may waive its rules for good cause.¹⁶ Waiver is appropriate where special circumstances warrant a deviation from the general rule and such deviation would better serve the public interest than strict adherence to the rule.¹⁷ Moreover, in deciding whether to grant a waiver, "the Commission may take into consideration questions of hardship, equity, or more effective implementation of overall policy on an individual basis."¹⁸ In the context of extending the deadline for special

¹⁵ *Modernizing the E-Rate Program for Schools and Libraries*, Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 8870, 8885 ¶ 34 (2014) ("July 2014 E-Rate Order") (setting a short term goal of "at least 100 Mbps per 1000 students and staff (users)" and a longer term goal of 1 Gbps per 1000 users.)

¹⁶ 47 C.F.R. § 1.3.

¹⁷ See *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹⁸ *Request for Waiver by Jemez Pueblo Tribal Consortium*, Order, 32 FCC Rcd 10238, n. 1 (WCB 2017) ("*Jemez Pueblo Consortium Order*") (citing *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969) *aff'd* 459 F.2d 1203 (D.C. Cir 1972)).

construction, the Wireline Competition Bureau has issued waivers when “(1) the applicant was unable to complete implementation for reasons beyond the service provider’s control, and (2) the petitioner made good faith efforts to comply with Commission rules and procedures” or when “the service provider is unwilling to complete installation because funding disbursements are delayed.”¹⁹ The size and complexity of the special construction project is a further factor in determining whether to waive the one-year funding deadline.²⁰ The Commission has also considered whether there was evidence of waste, fraud and abuse.²¹

All of these factors warrant the grant of a waiver in this instance. The project cannot realistically be completed in one year, a fact made clear in the projected timeline contained in Commnet’s accepted bid, which was included with the GCUSD’s 471 application. Commnet’s projected timeline includes nine months just to complete the negotiations necessary to obtain permits and rights-of-way access. The lengthy permitting process is necessitated by the large number of different entities involved and often extended time required to negotiate with federal agencies. Right-of-way access must be obtained from CenturyLink, the City of Williams, Arizona, the Town of Tusayan, Arizona, the Grand Canyon Railway, the National Forest Service, the National Park Service and the Grand Canyon National Park, and Arizona Public Service, the state’s largest electric utility. The negotiations to obtain permits could not begin until the E-Rate funding was approved. This was a stipulation set forth by the National Park and National Forest Service.

Following acquisition of the necessary access rights, Commnet projected nearly a year for actual construction of the nearly 67-mile fiber route from Williams to the school. Although a substantial portion of the build would be aerial utilizing existing utility poles in the Grand Canyon Railway’s right-of-way, significant make-ready work is required. There is also a limited construction season. The school district is located approximately one mile above sea level and construction typically becomes difficult if not

¹⁹ *Request for Waiver by Grants/Cibola Country School District Grants, New Mexico*, Order, 33 FCC Rcd 10048, 10051 ¶8 (WCB 2018) (“*Grants/Cibola Waiver Order*”).

²⁰ *See Request for Waiver by Utah Education and Telehealth Network*, 33 FCC Rcd 4607 (WCB 2018) (“*UETN Waiver Order*”).

²¹ *Jemez Pueblo Tribal Consortium Order*, 32 FCC Rcd. at 10241-10242, ¶ 7.

impossible between Thanksgiving and mid-March. Most of the fiber will be built in the Grand Canyon Railroad's easement. During severe weather, access to this easement becomes limited to non-existent.

Moreover, because the sole source of funding for the project is the E-Rate funding and the state matching contribution, Commnet has not been willing to begin construction until funding is in hand. The school district, whose annual budget is \$3,825,118, has no ability independently to pay for construction. In light of the delayed funding approval and the subsequent uncertainty regarding an extension of the June 30, 2019 funding deadline, no construction has been initiated. The service provider's unwillingness to undertake work until project funding was secured has constituted grounds for granting waivers of the one-year deadline.²²

Although no construction work has started, the school district has been meeting weekly with private and public officials to make progress on necessary permitting. The project has strong support from local and federal officials. As a result of these negotiating efforts, which have continued since the initial approval of the funding and through the pendency of the appeal of USAC's denial of the extension request, the school district has made significant progress on the necessary permitting and rights of way. Permits and access have been obtained from APS and the Grand Canyon Railway, for example. Progress has been made despite unavoidable impediments such as the prolonged government shutdown from December 22, 2018 to January 25, 2019, and the series of acting Grand Canyon National Park superintendents, as noted in GCUSD's June 6th letter to USAC.

C. USAC's Position that a Funding Commitment Is Not Late If It is Issued On or Before March 1st is Unreasonable and Inconsistent with Commission Rules and Directives

USAC's belated approval of the funding request on January 3, 2019, nearly half-way through the funding year, has created a number of problems. The delay in the funding request precluded the start of negotiations for rights of way. The progress that has been made on the permitting process described above is all the more impressive in light of USAC's delayed approval, which in turn delayed the start of the permitting process by six months.

²² See *Grants/Cibola Waiver Order*, 33 FCC Rcd at 10052, ¶¶ 10-11; *UETN Order*, 33 FCC Rcd at 4611, ¶ 10.

Late funding approval is one of the specific reasons set forth by the Commission and USAC for granting an extension and it was emphasized by the GCUSD in its extension request and appeal.²³ USAC, however, does not consider a funding request for special construction late unless it was awarded on or after March 1st of the funding year. In fact, USAC states that it will “automatically extend the service delivery date in situations” where the funding decision letter is issued on or after March 1st.²⁴

USAC’s rigid adherence to the March 1st cutoff date for determining when it will deem a funding commitment late is irrational as a policy matter and constitutes a gross misapplication of section 54.507(d) of the Commission’s rules. Receiving a funding commitment on or after March 1st for a special construction project that must be completed by June 30th provides insufficient time to complete all but the most rudimentary construction projects, let alone a 67-mile fiber route through private and public lands. Moreover, USAC’s reliance on the March 1st date misapplies the Commission’s rules, which apply the March 1st deadline to non-recurring services that need not be completed until *September 30th* not June 30th. Section 54.507(d)(4) of the Commission’s rules state that “[t]he deadline for implementation of all non-recurring services will be September 30 following the close of the funding year.” It further provides that an applicant may receive an extension of the September 30th deadline if “[t]he applicant’s funding commitment letter is issued by [USAC] on or after March 1 of the funding year for which discounts are authorized.”²⁵ USAC is misapplying the March 1st funding commitment date meant to apply to non-recurring service having until September 30th to be completed to projects required to be completed three months earlier, by June 30th.

Finally, USAC’s position that a funding commitment is not late unless issued on or after March 1st directly conflicts with Commission’s directive to USAC to process “funding commitments or denials

²³ *Id.* See generally, *July 2014 E-Rate Order*, 29 FCC Rcd at 8972, ¶ 254 (noting that funding delays “have real and substantial impacts on schools and libraries willingness and ability to purchase high-speed broadband services.”).

²⁴ USAC, E-Rate, Service Delivery, available at <https://www.usac.org/sl/applicants/before-youre-done/delivery-extension.aspx> (last visited July 29, 2019).

²⁵ 47 C.F.R. § 54.507(d)(4)(i). The rule provides that extensions may be granted if any one of four criteria are satisfied. The first criteria is a funding commitment issued on or after March 1st. *Id.* The other three criteria are: (1) a service provider change or service substitution after March 1st; (2) the service provider is unable to complete implementation for reasons beyond its control; or (3) the service provider is unwilling to complete installation because funding disbursements are delayed while USAC investigates the program for compliance. 47 C.F.R. § 54.507(d)(1)(ii)-(iv).

for all ‘workable’ funding requests by September 1st of each funding year.”²⁶ USAC’s January 3, 2019 funding commitment was demonstrably late under the Commission’s directive and USAC should have considered the late funding commitment as a factor in deciding whether to grant the extension.

D. USAC’s Position Precludes Construction Absent a Waiver

At bottom, USAC’s denial of the extension request and subsequent appeal appears primarily predicated on its view that no evidence of delays could be credited as unavoidable if the applicant’s service provider estimates up front that the project cannot feasibly be completed within one year.²⁷ As previously noted, given the amount of permitting required and the length of the fiber build, Commnet provided a timeline that projected completion beyond the end of the 2018 funding year. Commnet’s projected two-year timeline was made available to USAC as part of GCUSD’s application. Having approved the application with that projected timeline presented in it, USAC’s subsequent conclusion that this very same information precluded any extension no matter what other actions may have occurred that delayed progress is unreasonable.

USAC’s position puts the school district in an untenable position absent a waiver of rule 54.507(d) and the requirement that the construction must be completed by June 30, 2019. It effectively precludes funding for any project that is reasonably projected to take more than one year to fund, at least where that timeline has been made known to USAC.²⁸ The GCUSD does not believe that it is the Commission’s intent to forever preclude E-Rate funding for projects, no matter how meritorious, if construction is anticipated to extend beyond one year. To the contrary, the Bureau has granted waivers

²⁶ See *July 2014 E-Rate Order*, 29 FCC Rcd at 8893 ¶ 59; Letter from Ajit Pai, Chairman, Federal Communications Commission to Chris Henderson, CEO, USAC, April 18, 2017(reiterating the Commission’s directive to make funding decisions by September) available at <https://www.fcc.gov/document/chairman-pai-letter-regarding-usacs-administration-e-rate>.

²⁷ See *July 24, 2019 RFCDL* at 6.

²⁸ Constructing fiber is the only reasonable means for the school district to obtain high-speed broadband services. The National Park Service has prohibited the construction of any structures to support microwave broadband service. See Exhibit 12, *GCUSD June 6, 2019 Letter* at 2.

for complex construction projects where strict adherence to the Commission's rules would leave inadequate time to complete construction of a planned multi-year network.²⁹

As was the case in the *UETN Order*, a waiver of the June 30, 2019 deadline is necessary to complete the project. Neither of the Commission's possible remedies for lengthier projects provides relief here. One remedy allows award recipients to retroactively receive funding for construction costs incurred six months prior to the funding year.³⁰ This remedy, however, is unavailing where, as here, the service provider will not begin construction work until funding has been approved and the applicant is in no position to fund construction and incur the risk that funding will not be awarded. The second remedy adopted by the Commission is to obtain a one-year extension, which for all of the reasons set forth herein USAC has deemed to be unavailable to the school district.

Nor was it possible to break this project down into stages as the Bureau has suggested where applicants know in advance that their project will take longer than a year to complete.³¹ For example, the Bureau has suggested that school districts consider building to some locations in one year and then to other locations the next year.³² The GCUSD consists of a single location. Thus the entire 67-mile route must be constructed before the school district could receive services.

Re-applying for funding is also problematic. On March 11, 2019, the GCUSD refiled the same application for the 2019 funding year as a back-up plan if the extension was not granted. A PIA review was begun on that application but has been put on hold until Labor Day pursuant to a summer deferral. There is, of course, no assurance that this application will be approved or, if approved, the approval would be timely. USAC may well decide that the renewed application suffers from the same infirmity that led USAC to deny the request of an extension—it incorporates Commnet's original estimate that the project will take two years to complete. Commnet's timeline had not been adjusted to account for the

²⁹ *UETN Order*, 33 FCC Rcd at 4611, ¶ 11 (granting two-year extension to complete construction in light of difficult terrain and abbreviated construction season.)

³⁰ *Modernizing the E-Rate Program for Schools and Libraries*, Second Report and Order and Order on Reconsideration, 29 FCC Rcd 15538, 15552 ¶ 38 (2014) ("*Second E-Rate Order*").

³¹ *UETN Order*, 33 FCC Rcd at n. 46.

³² *Id.*

progress made in permitting. The GCUSD intends to withdraw the application if the waiver is not granted.

Renewed applications also run some risk of forfeiting the state matching funding. As noted, the state has made a funding commitment pegged to Commnet's accepted bid. It is hoped that the state would once again commit matching funds, and the state has made some informal indications it will once again make the funding available— but this cannot be guaranteed and such informal assurances are not the same as a funding commitment in hand.

Finally, there is no evidence or indication of any waste, fraud or abuse relating to this project. To the contrary, it is virtually a poster child for the type of project that the E-Rate program was intended to support. The GCUSD's students find themselves on the wrong side of the digital divide. The high-speed internet access that this project will bring to those students will help close the digital divide that this Commission has made its highest priority.

Under these unique circumstances, the GCUSD respectfully requests that the Bureau direct USAC to award the funding as initially approved and afford the school district 18 months to complete construction and receive the lit fiber service. With the progress made on seeking permits, Commnet is confident that it can complete the construction and turn on service by June 30, 2020, assuming that the decision on funding is made quickly and the current construction season can be used. In light of the initial delay in approval and USAC's subsequent denial of the extension request, the school district believes it would be prudent to include some cushion to ensure sufficient time for completion and thus requests 18 months to complete the project.

The equities here are compelling given the lack of real broadband access presently available to the school district and its students. The public interest in taking this one additional step to bridge the rural digital divide far outweighs rigid adherence to the requirement that construction be completed and fiber be lit within one year.

CONCLUSION

For the foregoing reasons, the GCUSD respectfully requests that the Bureau grant the requested waiver, and the waiver of any other rules, such as invoicing deadlines, as may be necessary to allow the GCUSD 18 months to complete the fiber installation and utilize its funding commitment.

/s/ Michael H. Pryor

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District*

July 30, 2019

19542146

Exhibit 1

FCC Form 470 – Funding Year 2018



FCC Form 470 – Funding Year 2018

Form 470 Application Number: 180016780
18-GCUSD

Billed Entity

GRAND CANYON UNIF SCHOOL DIST
100 BOULDER ST
GRAND CANYON, COCONINO, AZ 86023-0519
928-638-2461

Contact Information

Derrick Tutt
dtutt@grandcanyonschool.org
928-638-2461

Billed Entity Number: 143156

FCC Registration Number: 0001596899

Application Type

Applicant Type: School District

Recipients of Services: Public School; Public School District

Number of Eligible Entities: 3

Consulting Firms

Name	Consultant Registration Number	Phone Number	Email
Nicely Done Consulting	16043643	623-780-5737	stephanie@nicelydoneconsulting.com

Consultants

Name	Phone Number	Email
Ernest Nicely	623-780-5737 ext.513	ej@nicelydoneconsulting.com
Nicely Done Consulting NDC	623-780-5737	erate@nicelydoneconsulting.com
Stephanie Nicely	623-780-5737	stephanie@nicelydoneconsulting.com

RFPs

Id	Name
46075	GCUSD_2018_RFP 18-01 - Internet and ISP Services

Category One Service Requests

Service Type	Function	Other	Minimum Capacity	Maximum Capacity	Entities	Quantity	Unit	Installation and Initial Configuration?	Maintenance and Technical Support?	Associated RFPs
Internet Access and/or Telecommunications	Internet Access & Transport Bundled		50 Mbps	1 Gbps	3	1	Circuits	Yes	No	46075
Internet Access and/or Telecommunications	Internet Access: ISP Service Only		50 Mbps	1 Gbps	3			Yes	No	46075
Internet Access and/or Telecommunications	Leased Lit Fiber		50 Mbps	1 Gbps	3	1	Circuits	Yes	No	46075
Internet Access and/or Telecommunications	Transport Only – No ISP Service Included		50 Mbps	1 Gbps	3	1	Circuits	Yes	No	46075

Description of Other Functions

Id	Name
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Narrative

Internet Access & Transport Bundled Basic Conduit/ISP services for district and schools. Please quote minimum of 50mbps, maximum of 1gbps with increments of 100 mbps increments between 100mbps and 1gbps. Multi year contract should allow for upgrades/downgrades to quoted bandwidths during term. Please see posted RFP for detailed specification and specific submission requirements. Please note that the district is remotely located and overnight delivery service may not be eligible due to location and weather.

Internet Access: ISP Service Only Please see posted RFP for detailed specification and specific submission requirements. Please quote minimum of 50mbps, maximum of 1gbps with increments of 100 mbps increments between 100mbps and 1gbps. Multi year contract should allow for upgrades/downgrades to quoted bandwidths during term. Please note that the district is remotely located and overnight delivery service may not be eligible due to location and weather.

Leased Lit Fiber Leased lit fiber solution to provide transport from district to 3rd party data center. Please quote minimum of 50mbps, maximum of 1gbps with increments of 100 mbps increments between 100mbps and 1gbps. Multi year contract should allow for upgrades/downgrades to quoted bandwidths during term. Please see posted RFP for detailed specification and specific submission requirements. Please note that the district is remotely located and overnight delivery service may not be eligible due to location and weather.

Transport Only - No ISP Services Included Leased lit fiber solution to provide transport from district to 3rd party data center. Please quote minimum of 50mbps, maximum of 1gbps with increments of 100 mbps increments between 100mbps and 1gbps. Multi year contract should allow for upgrades/downgrades to quoted bandwidths during term. Please see posted RFP for detailed specification and specific submission requirements. Please note that the district is remotely located and overnight delivery service may not be eligible due to location and weather.

Installment Payment Plan

Range of Years: 1 - 4 Years

Payment Type: Annual

Category Two Service Requests

Service Type	Function	Manufacturer	Other	Entities	Quantity	Unit	Installation and Initial Configuration?	Associated RFPs
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Description of Other Manufacturers

Id	Name
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Narrative

Technical Contact

State and Local Procurement Restrictions

REQUEST FOR COMPETITIVE SEALED PROPOSALS for materials & services specified in this Form 470 & associated documents. Contacting the District's staff is restricted to instructions in Terms & Conditions of posted RFP & any Addenda. In accordance with School District Procurement Rules in AZ Administrative Code (A.C.C.) promulgated by State Board of Education pursuant to A.R.S. §15-213, competitive sealed proposals for the materials/ services specified will be received by the applicant, at the specified location, until time & date cited. Proposals received by correct time & date will be opened & the name of each offeror shall be publicly read. Late proposals shall not be considered by statute. Proposals must be submitted in a sealed container w/ the RFP number & the Offeror's name & address clearly indicated on the envelope. Instructions for preparing the proposal are provided within the Terms & Conditions of the posted RFP & any Addendums. Proposals that don't conform to these instructions, or any proposal that is generic in nature/otherwise does not meet the requirements of this Form 470 & associated specifications, may be considered non-responsive & may be disqualified. All original contracts offered for less than a 60-month term should allow for annual 1 year extensions and/or month to month extensions at the discretion of the applicant; not to exceed a total of 60 months. **OFFERORS ARE STRONGLY ENCOURAGED TO CAREFULLY READ THE ENTIRE RFP.** Any pricing proposed must comply w/ the FCC Lowest Corresponding Price Rule as required by the Universal Service First Report and Order, & restated in the FCC E-Rate Modernization Report & Order, adopted 7/11/14. The FCC LCP rule prohibits an E-rate services offeror from offering/charging E-rate applicants a price higher than the lowest price that

the offeror charges to non-residential customers who are similarly situated to a particular school, library, rural health care provider/consortium that purchase directly from offeror.

Recipients of Service

Billed Entity Number	Billed Entity Name
143156	GRAND CANYON UNIF SCHOOL DIST

Certifications

I certify that the applicant includes:

I certify that the applicant includes schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801 (18) and (38), that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million.

Other Certifications

I certify that this FCC Form 470 and any applicable RFP will be available for review by potential bidders for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted will be carefully considered and the bid selected will be for the most cost-effective service or equipment offering, with price being the primary factor, and will be the most cost-effective means of meeting educational needs and technology goals.

I certify that I have reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that I have complied with them. I acknowledge that persons willfully making false statements on this form may be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the form for, receipt of, and delivery of services receiving schools and libraries discounts. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500, and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this form have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I acknowledge that support under this support mechanism is conditional upon the school(s) and/or library(ies) I represent securing access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that I have considered what financial resources should be available to cover these costs. I certify that I am authorized to procure eligible services for the eligible entity(ies). I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this form, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

NOTICE:

In accordance with Section 54.503 of the Federal Communications Commission's ("Commission") rules, certain schools and libraries ordering services that are eligible for and seeking universal service discounts must file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator. 47 C.F.R. § 54.503. The collection of information

stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.503. Schools and libraries must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information requested in this form. We will use the information you provide to determine whether you have complied with the competitive bidding requirements applicable to requests for universal service discounts. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, the information you provide in this form may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information you provide in this form may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, information provided in or submitted with this form, or in response to subsequent inquiries, may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law.

If you owe a past due debt to the federal government, the information you provide in this form may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC or Universal Service Administrator may return your form without action or deny a related request for universal service discounts.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 3.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

Authorized Person

Stephanie Nicely
Nicely Done Consulting
3820 W. Happy Valley Rd, Suite 141 #497
Glendale, AZ 85310
623-780-5737
stephanie@nicelydoneconsulting.com

Certified Timestamp

01/18/2018 08:51 PM MST

Exhibit 2
GCUSD Project Overview Map

GCUSD Project Overview Map

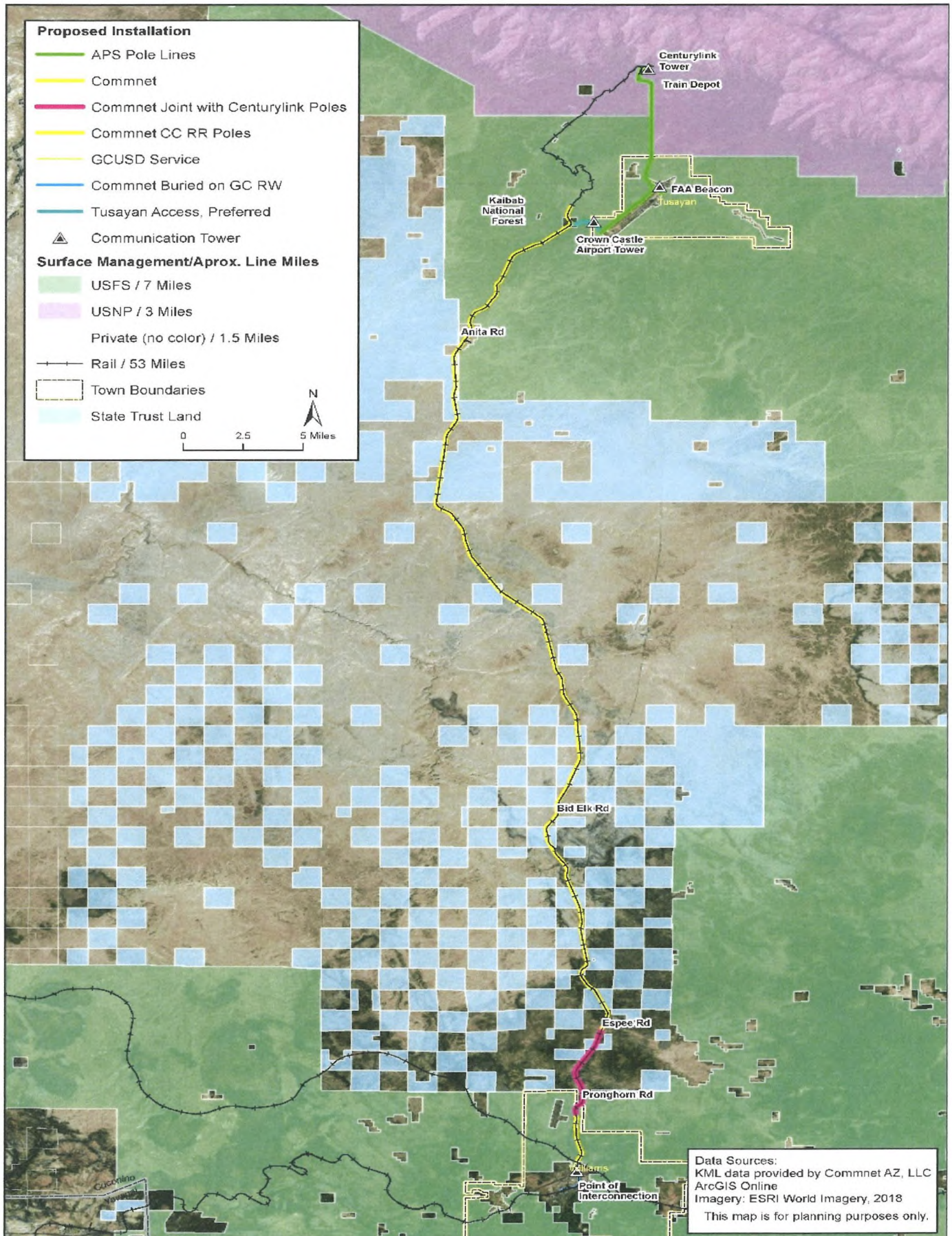


Exhibit 3

Arizona Department of Education, State Matching Funding Request

ARIZONA DEPARTMENT OF EDUCATION



State Match Funding Request

COMPANY INFORMATION

School / District / Library Name: Grand Canyon Unified School District

Address: 1 Boulder St.
Grand Canyon, AZ 86023

County: Coconino

Telephone number: 928-638-2461

Primary Contact: Matt Yost

Contact Email: myost@grandcanyonschool.org

Contact Phone: 928-638-2461

Consultant: Nicely Done Consulting

REQUIRED ITEMS:

- ☐ Form 470 Number 180016780
- ☐ Billed Entity Number 143156
- ☐ Number of Bids Received 2 – Commnet and Sun Corridor. Can't use Sun Corridor because no transport connection to NAU.
<https://nicelydoneconsulting.box.com/s/7ikeu8dxy0ufkulfg0yl1fat1kj6kjd>
- ☐ Bid Evaluation Document <https://nicelydoneconsulting.box.com/s/mjq14kzryij7dpcww6xabo2iiyrmyii>

Determination to accept single offer:
<https://nicelydoneconsulting.box.com/s/v2aesm5xwkn5xtf92vol7ic14b41dijo>
- ☐ Total Cost for Construction (\$) \$5,660,200.37
- ☐ NSLP % (Category 1 Erate Discount Rate) 59% NSLP = 80% discount rate
- ☐ Total State Match Requested (\$)¹ \$566,020.04
- ☐ Selected Vendor Commnet
- ☐ Vendor SPIN / 498 143050194
- ☐ List of sites planned for construction / Speeds 200Mbps Lit Fiber Internet to support district with 2 schools.

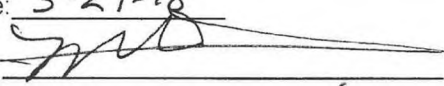
Approved Signatory

3/19/2018

Date

¹Total State Match Should be equivalent to ten percent (10%) of the total special construction costs for the project for all applicants with an E-rate discount percentage of 80% or less; for those with discount levels above 80%, Total State Match should be one half of the remaining special construction costs.

Approval Date: 3-21-18

Approved By: 

MILAN ZATON / ADE

Exhibit 4

Form 471, Application Number 181034007



Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname 18-GCUSD-IA
Funding Year 2018

Application Number 181034007
Category of Service Category 1

Billed Entity

GRAND CANYON UNIF SCHOOL DIST
100 BOULDER ST GRAND CANYON AZ 86023 - 0
519
928-638-2461

Contact Information

Derrick Tutt
928-638-2461
dtutt@grandcanyonschool.org

Billed Entity Number 143156
FCC Registration Number 0001596899
Applicant Type School District

Holiday/Summer Contact Information

During summer hours, please contact: Stephanie Nicely Nicely Done Consulting Phone: 623-780-5737 ext 502 Fax: 602-635-3442 Email: stephanie@nicelydoneconsulting.com

Consulting Firms

Name	Consultant Registration Number	City	State	Zip Code	Phone Number	Email
Nicely Done Consulting	16043643	Glendale	AZ	85310	623-780-5737	stephanie@nicelydoneconsulting.com

Entity Information

School District Entity - Details

BEN	Name	Urban/Rural	State LEA ID	State School ID	NCES Code	School District Attributes	Endowment
143156	GRAND CANYON UNIF SCHOOL DIST	Rural				Public School District	None

Related Entity Information

Related Child School Entity - Details

BEN	Name	Urban/Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
98606	GRAND CANYON HIGH SCHOOL	Rural		030204000		None	Public School	None

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
98607	GRAND CANYON SCHOOL	Rural				None	Public School	None

Related Child School Entity - Discount Rate Calculation Details

BEN	Name	Urban/ Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
98606	GRAND CANYON HIGH SCHOOL	Rural	71	N/A	
98607	GRAND CANYON SCHOOL	Rural	219	N/A	

Related School District NIFs

School District BEN	School District Name	NIF BEN	NIF Name
143156	GRAND CANYON UNIF SCHOOL DIST	17005715	GRAND CANYON USD CENTRAL OFFICE

Discount Rate

School District Enrollment	School District NSLP Count	School District NSLP Percentage	School District Urban/ Rural Status	Category One Discount Rate	Category Two Discount Rate	Voice Discount Rate
290	171	59.0%	Rural	80%	80%	0%

Funding Request for FRN #1899065544

Funding Request Nickname: 18-GCUSD-SC

Service Type: Data Transmission and/or Internet Access

Fiber Request Key Information

Special Construction, Maintenance and Operations, or Network Equipment? Yes

Is this FRN supporting leased lit fiber, dark fiber or self-provisioned new or existing fiber? Lit Fiber

FRN Key Information for Special Construction

Total Project Plant Route Feet 351637 Total Strands 4

Average Cost per foot of outside plant \$16.10 Number of E-rate Eligible Strands 4

Is state or tribal match available for this FRN? Yes

State/Tribal Match Amount	Source of Matching Funds	Source of Matching Funds Documents
\$566,020.04	Arizona Universal Service Fund	Arizona Corporation Commission Decision.pdf Grand Canyon USD 2018 Funding Letter.pdf

Does the FRN include an installment payment agreement for special construction charges? No

Does this installment agreement include a balloon payment? No

Agreement Information - Contract

Contract Number 18-01 A

Account Number

Establishing FCC Form 470 180016780

Service Provider Commnet AZ, LLC (SPN: 143050194)

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Based on State Master Contract? No

Award Date March 17, 2018

Based on a multiple award schedule? No

How many bids were received for this contract? 2

Includes Voluntary Extensions? No

What is the service start date? July 01, 2018

Remaining Voluntary Extensions

Total Remaining Contract Length

What is the date your contract expires for the current term of the contract? June 30, 2023

Document Name	Document Description
GCUSD_Commnet_IA_18-23_CS.pdf	Contract allows for upgrades to 1gbps

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative

Special construction charges for internet access circuit. 4 strand 66.598 miles = 351,637 feet 16.10 a foot

Line Item # 1899065544.001

Product and Service Details

Purpose

Data connection(s) for an applicant's hub site to an Internet Service Provider or state/regional network where Internet access service is billed separately

Function

Fiber

Type of Connection

Lit Fiber (with Special Construction)

Bandwidth Speed

Upload Speed

200.0 Mbps

Download Speed

200.0 Mbps

Connection Information

Does this include firewall services?

No

Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a "Wide area network")? No

Is this a direct connection to a single school, library or a NIF for Internet access?

No

Cost Calculation for FRN Line Item # 1899065544.001

Monthly Cost	
Monthly Recurring Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 1
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Unit Cost	\$5,660,200.37
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$5,660,200.37
One-time Quantity	x 1
Total Eligible One-time Costs	= \$5,660,200.37
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$5,660,200.37
Pre-Discount Extended Eligible Line Item Cost	= \$5,660,200.37

Recipients of Services

BEN	Name
98606	GRAND CANYON HIGH SCHOOL
98607	GRAND CANYON SCHOOL
17005715	GRAND CANYON USD CENTRAL OFFICE

FRN Calculation for FRN #1899065544

One-Time Charges	
Total One-Time Charges	\$5,660,200.37
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$5,660,200.37

Total Requested Amount	
Total Pre-Discount Charges	\$5,660,200.37
Special Construction State/Tribal Match Percentage	10%
Special Construction State/Tribal Match Discount Rate*	90%
Funding Commitment Request	= \$5,094,180.33

Funding Request for FRN #1899065545

Funding Request Nickname: 18-GCUSD-IA

Service Type: Data Transmission and/or Internet Access

Agreement Information - Contract

Contract Number	18-01 A	Account Number	
Establishing FCC Form 470	180016780	Service Provider	Commnet AZ, LLC (SPN: 143050194)
Was an FCC Form 470 posted for the product and/or services you are requesting?	Yes	Based on State Master Contract?	No
Award Date	March 17, 2018	Based on a multiple award schedule?	No
How many bids were received for this contract?	2	Includes Voluntary Extensions?	No
What is the service start date?	July 01, 2018	Remaining Voluntary Extensions	
		Total Remaining Contract Length	
		What is the date your contract expires for the current term of the contract?	June 30, 2023

Document Name	Document Description
GCUSD_Commnet_IA_18-23_CS.pdf	Contract allows for upgrades to 1gbps

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative Monthly service charges for internet access for district and school. 200mbps fiber ethernet

Line Item # 1899065545.001

Product and Service Details

Purpose

Internet access service that includes a connection from any applicant site directly to the Internet Service Provider

Function

Fiber

Type of Connection

Ethernet

Bandwidth Speed

Upload Speed

200.0 Mbps

Download Speed

200.0 Mbps

Connection Information

Does this include firewall services?

No

Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a "Wide area network")?

No

Is this a direct connection to a single school, library or a NIF for Internet access?

Yes

Cost Calculation for FRN Line Item # 1899065545.001

Monthly Cost	
Monthly Recurring Unit Cost	\$3,000.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$3,000.00
Monthly Quantity	x 1
Total Monthly Eligible Recurring Costs	= \$3,000.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$36,000.00

One-Time Cost	
One-time Unit Cost	\$0.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$0.00
One-time Quantity	x 0
Total Eligible One-time Costs	= \$0.00
Summary	
Total Eligible Recurring Costs	\$36,000.00
Total Eligible One-time Costs	+ \$0.00
Pre-Discount Extended Eligible Line Item Cost	= \$36,000.00

Recipients of Services

BEN	Name
98606	GRAND CANYON HIGH SCHOOL
98607	GRAND CANYON SCHOOL
17005715	GRAND CANYON USD CENTRAL OFFICE

FRN Calculation for FRN #1899065545

Monthly Charges	
Total Monthly Recurring Charges	\$3,000.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$3,000.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$36,000.00

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$36,000.00
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$36,000.00
Discount Rate	80%
Funding Commitment Request	= \$28,800.00

Connectivity Questions

District/System-wide Internet Access Questions

Does your school district currently aggregate Internet access for the entire district(as opposed to buying Internet access on a building-by-building basis)? Yes

Download Speed 10.50 Download Speed Units Mbps

Upload Speed 1.10 Upload Speed Units Mbps

Per Entity Basis Questions

Entity Name GRAND CANYON UNIF SCHOOL DIST Entity Number 143156

BEN	Entity Name	Download	Units	Upload	Units	Connection	Wifi Sufficient	Barriers to Robust Network
98606	GRAND CANYON HIGH SCHOOL	10.00	Mbps	1.10	Mbps	Copper	Never	Broadband connection speed to building is too slow
98607	GRAND CANYON SCHOOL	10.00	Mbps	1.10	Mbps	Copper	Never	Broadband connection speed to building is too slow

Certifications

I certify that the entities listed in this application are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

Summary	
Total funding year pre-discount eligible amount on this FCC Form 471	\$5,696,200.37
Total funding commitment request amount on this FCC Form 471	\$5,122,980.33
Total applicant non-discount share of the eligible amount	\$573,220.04
Total budgeted amount allocated to resources not eligible for E-rate support	\$0.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	\$573,220.04
Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year?	No
Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share?	No

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. §

54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

Authorized Person

Title:	Consultant	Name:	Stephanie Nicely
Phone:	623-780-5737	Email:	stephanie@nicelydoneconsulting.com
Address:	3820 W. Happy Valley Rd Suite 141 #497 Glendale AZ 85310	Employer:	Stephanie Nicely

Certified Timestamp

22-Mar-2018 03:51:25 EDT

Exhibit 5
Commnet PDF

GRAND CANYON UNIFIED SCHOOL DISTRICT
PURCHASING DEPARTMENT
100 BOULDER STREET
GRAND CANYON, AZ 86023

OFFER

RFP #18-01

TO GRAND CANYON UNIFIED SCHOOL DISTRICT:

The Undersigned hereby offers and agrees to furnish the material, service or construction in compliance with all terms, conditions, specifications and amendments in the Solicitation and any written exceptions in the Offer. Signature also certifies understanding and compliance with GRAND CANYON UNIFIED SCHOOL DISTRICT's Standard Terms and Conditions.

Arizona Transaction (Sales Privilege) for clarification of this offer, contact.

Tax License No. 20100174 Federal Employer Identification 82-1280497

Name Evan Lewis

Phone/Fax (501) 448-1272

Commnet AZ, LLC
Company Name

John D. Champagne
Authorized Signature

400 Northridge Rd. Suite 325
Address

John Champagne
Printed Name

Atlanta GA 30350
City State Zip

Vice President of Planning and Development
Title

ACCEPTANCE OF OFFER AND CONTRACT AWARD (FOR DISTRICT USE ONLY)

Your Offer is hereby accepted. The Contractor is now bound to sell the materials, services or construction listed by the attached award notice based upon the Solicitation, including all terms, conditions, specifications, amendments, etc., and the Contractor's offer as accepted by the District.

This Contract shall henceforth be referred to as Contract No. 18-01 A

The Contractor is hereby cautioned not to commence any billable work or provide any material, service or construction under this Contract until Contractor receives an executed purchase order or Contract release document from GRAND CANYON UNIFIED SCHOOL DISTRICT.

Awarded this 17 day of March

MAT Y Matthew Yost Assistant Superintendent GCUSD#
AUTHORIZED SIGNATURE NAME & TITLE

Appendix A: MRC/NRC Cost Table

Option 1: Internet plus Transport Bundled

Bandwidth	Eligible Monthly Recurring Cost	Ineligible monthly recurring cost	Eligible install/non-recurring cost	Ineligible install/non-recurring cost
50 Mbps	\$1,400.00			
100 Mbps	\$2,750.00			
200 Mbps	\$3,000.00			
300 Mbps	\$4,580.00			
400 Mbps	\$6,035.00			
500 Mbps	\$7,510.00			
600 Mbps	\$9,000.00			
700 Mbps	\$10,510.00			
800 Mbps	\$12,500.00			
900 Mbps	\$14,000.00			
1 Gbps	\$15,950.00			

Option 2: Transport Only

Bandwidth	Eligible Monthly Recurring Cost	Ineligible monthly recurring cost	Eligible install/non-recurring cost	Ineligible install/non-recurring cost
50 Mbps	N/A			
100 Mbps	N/A			
200 Mbps	N/A			
300 Mbps	N/A			
400 Mbps	N/A			
500 Mbps	N/A			
600 Mbps	N/A			
700 Mbps	N/A			
800 Mbps	N/A			
900 Mbps	N/A			
1 Gbps	N/A			

Option 3: ISP Only

Bandwidth	Eligible Monthly Recurring Cost	Ineligible monthly recurring cost	Eligible install/non- recurring cost	Ineligible install/non- recurring cost
50 Mbps	N/A			
100 Mbps	N/A			
200 Mbps	N/A			
300 Mbps	N/A			
400 Mbps	N/A			
500 Mbps	N/A			
600 Mbps	N/A			
700 Mbps	N/A			
800 Mbps	N/A			
900 Mbps	N/A			
1 Gbps	N/A			

Appendix B: Special Construction Pricing:

Description of Service	Strand Count	Mileage	Total Cost	Eligible Cost	Ineligible Cost
Internet/Transport to district hub	4	66.598	\$5,660,200.37	\$5,660,200.37	-

Cost Breakdown by type of plant:

	Construction costs	Design/Engineering	Total
Underground	\$1,291,224.34	\$11,248.60	\$1,302,472.94
Aerial	\$4,214,258.39	\$143,469.04	\$4,357,727.43
Splicing	\$ 4,012.80		
	\$5,509,495.53	\$154,717.64	\$5,660,200.37

96 count fiber allocated at 1/24 (4 strands)

Loop to School in Aerial -estimated 2024 Linear Feet with entrance

Appendix C: Special Construction Schedule:

Project Activities	E-RATE FISCAL YEAR 2018-19								E-RATE FISCAL YEAR 2019-20							
	Q3 2018		Q4 2018		Q1 2019		Q2 2019		Q3 2019		Q4 2019		Q1 2020		Q2 2020	
FCDL/Contract Issued																
Right of Way/Engineering/Permitting																
Make Ready/Construction																
Network Commissioning/Turn Up																
Testing/Acceptance																

Exhibit 6

Commnet February 23, 2018 proposal in response to
the RFP



February 23, 2018

Attn: Mr. Derrick Tutt
Grand Canyon Unified School District
P. O. Box 519
100 Boulder Street
Grand Canyon, Arizona 86023

RE: Request for Proposal #18-01
High Speed Connectivity to the Grand Canyon unified School District
FCC Form 470 Application Number: 180016780 (18-GCUSD)

Dear Mr. Tutt;

Commnet AZ, LLC (SPIN #143050194) hereby submits the enclosed proposal in response to the above referenced RFP. Enclosed, please find three (3) printed copies and one (1) electronic copy as required in the RFP. Commnet is excited about the opportunity to work with the Grand Canyon Unified School District to meet its broadband needs to the benefit of its students.

Additionally, by placing the signature below, I certify that (1) I have read the RFP in its entirety; (2) I am authorized to submit the enclosed response on behalf of Commnet AZ, LLC; and (3) agree to furnish the equipment, services and support specified in accordance with the response.

Thank you for your consideration and please do not hesitate to contact me by phone at (972) 839-8006 or via e-mail at JChampagne@atni.com if you have any questions.

Sincerely,

John Champagne
Vice President Planning and Development

COMMNET AZ, LLC

Response of Commnet AZ, LLC

Grand Canyon Unified School District
RFP for Internet and ISP Services

2/23/2018

Contact:
John Champagne
Vice President Planning and Development
972-839-8006
JChampagne@atni.com

UAC SPIN: 143050194

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1 Scope of Services - CE

Commnet Response:

Commnet proposes to provide a bundled, single provider solution consisting of transport plus internet service delivered directly to the demarcation point (100 Boulder St – Building 400). The services proposed will meet all specifications provided under the scope of services in the RFP (#18-01).

The proposal provides pricing for bandwidth throughput at a minimum of 50Mbps to a maximum of 1Gbps. The solutions are scalable and can provide 2Gbps, or more, if requested. Appendix A provides pricing for symmetrical 50Mbps to 1Gbps service. The quote includes any and all routers and switches necessary to deliver broadband with an Ethernet hand off at the demarcation point. The monthly recurring charges also reflect all equipment costs, taxes and/or fees. Delivery of the proposed services and the pricing contained in **Appendix A** is contingent upon Commnet being awarded the special construction project identified below and in Appendix B.

Special Construction

In order to deliver the proposed services, Commnet is proposing an all fiber solution – no wireless facilities are proposed herein - that will leverage existing fiber and new construction. Commnet will utilize existing fiber installations to the maximum extent feasible, in order to: 1) reduce overall costs; and 2) expedite completion of the project. Where using existing fiber is not feasible, Commnet proposes to install new fiber.

Pricing information for the special construction of the proposed network is included in **Appendix B**. This quote is representative of cost to construct the network facilities, the design and engineering of the network, and the project management. Any and all permitting fees and filing of the permits are included. Commnet stands ready to provide the additional information identified in Appendix B if chosen to be the service provider.

Delivery of Services Requested

As presented in **Appendix C**, construction of the proposed network is expected to take up to 24 months. Since delivery of the proposed services is contingent upon completion of the proposed network, the projected date for the delivery of services requested in this RFP is July 1, 2020.

Authority to provide Requested Services

Commnet has the necessary authority to construct and operate the proposed fiber network. Documentation to verify Commnet's authority is provided in **Appendix D**. Additionally, Commnet has the experience, capability and relationships to leverage existing networks and construct the proposed network in the Grand Canyon area. **USAC SPIN #143050194**.

2 Coordination and Contact -C

Commnet Response:

Have read and will comply.

3 Schedule - CE

Commnet Response:

Applicant will comply with proposed schedule identified in the RFP. Please see Appendix C for the projected special construction schedule and service delivery dates.

The projected special construction timeline may vary based on final route determination and the Rights of Way/Easement process. The timeline for securing the required Rights of Way/Easements to construct part of the proposed network is the single biggest unknown factor at this time since the process is beyond the company's control. The Company anticipates having to work with the National Forest Service, National Park Service and the towns of Tusayan and Williams. Commnet will work diligently to secure the necessary Rights of Way/Easements as expeditiously as possible.

Proposed schedule:

- 1) Contract signed - Day 1
- 2) Finalizing Design, Engineering, and Permitting - 180-210 days, Federal easements may delay this but these will run as concurrent activities.
- 3) Construction - 240-270 days. This will include make ready, placement, splicing, cabinet placement.
- 4) Commissioning - 30-60 days. This will be prior to commencing Test and Turn up to provide for initial network commissioning, management, and integration.
- 5) Acceptance Testing - 30 days per 7.2 of this RFP.

3.1 Timeliness of Delivery - C

Commnet Response:

Have read and will comply.

3.2 Response Compliance - C

Commnet Response:

Have read and will comply.

3.3 Response format - C

Commnet Response:

Have read and will comply.

3.4 Questions - C

Commnet Response:

Have read and will comply.

4 Evaluation of Proposals

4.1 Sole Judge

Commnet Response:

Have read and understand

4.2 Evaluation Factors

Commnet Response:

Have read and understand

4.3 Contract Negotiations

Commnet Response:

Have read and understand

5 RFP Terms and Conditions

5.1 Right to Change – C

Commnet Response:

Have read and understand

5.2 Equipment Quantities - C

Commnet Response:

Have read and understand

5.3 Cost of Preparing Responses - C

Commnet Response:

Have read and understand

5.4 Responses Considered Property of GCUSD – C

Commnet Response:

Have read and understand

5.5 No Obligation to Enter into Contract – C

Commnet Response:

Have read and understand

5.6 Minor Administrative Irregularities – C

Commnet Response:

Have read and understand

5.7 Binding Signature – C

Commnet Response:

Have read and understand

5.8 Payment for Services – C

Commnet Response:

Have read and understand

6 General Requirements

6.1 Requirements Response -C

Commnet Response:

Have read and will comply.

6.2 Respondent Commitments - C

Commnet Response:

Have read and will comply.

6.2.1 Single Point of Contact (SPOC) - C

Commnet Response:

Have read and will comply.

6.2.2 What constitutes a Binding Commitment – C

Commnet Response:

Have read and will comply.

6.2.3 Five Year Commitment – C

Commnet Response:

Have read and will comply.

6.2.4 Termination for default - C

Commnet Response:

Have read and will comply.

6.3 Contractors and Subcontractors

6.3.1 Use of subcontractors – CE

Commnet Response:

Team Fishel has already been awarded a contract for and produced a preliminary engineering feasibility assessment. The study looked at 11 alternative route options based on cost, complexity, and time to construct. Please see **Appendix E** for a high level route design based on the study findings.

The construction, engineering, design, and commissioning of the network will be subcontracted where Team Fishel will be shorted listed for the additional contracts.

Contractors will be designated when final route plans and designs are completed. See **Appendix F** for resume, qualifications, references and licenses held by Team Fishel. Their contractor licenses in the state of Arizona are 097026 and 0936622.

6.3.2 Contractor Liability for subcontractors - C

Commnet Response:

Have read and will comply

6.3.3 Contractor Liability for Damage - C

Commnet Response:

Have read and will comply.

6.3.4 Contractor Discipline - C

Commnet Response:

Have read and will comply.

6.3.5 Non-Business Hour Work - C

Commnet Response:

Have read and will comply.

6.3.6 Pricing

6.3.6.1 Best Pricing - C

Commnet Response:

Have read and will comply.

6.3.6.2 Continual Improvement - C

Commnet Response:

Have read and will comply.

6.3.6.3 Detailed Pricing - C

Commnet Response:

Have read and will comply. Detailed Pricing is provided in Appendices A & B.

7 Acceptance Testing

7.1 Acceptance Testing for Replacements - C

Commnet Response:

Have read and will comply.

7.2 Acceptance Test Period – C

Commnet Response:

Have read and will comply.

7.3 Acceptance Test Plan – C

Commnet Response:

Have read and will comply.

7.4 Contractor Support during Acceptance Testing - C

Commnet Response:

Have read and will comply.

7.5 General Commercial Shipping Release - C

Commnet Response:

Have read and will comply.

7.6 GCUSD Sole Judge of Acceptance – C

Commnet Response:

Have read and will comply.

7.7 Performance and Operating Standards – C

Commnet Response:

Have read and will comply.

7.8 Formal Acceptance – C

Commnet Response:

Have read and will comply.

7.9 Work Outside Scope of Contract – C

Commnet Response:

Have read and will comply.

7.10 Outstanding Issues – C

Commnet Response:

Have read and will comply.

7.11 Consequences for Failure to Meet Performance and Operating Standards - C

Commnet Response:

Have read and will comply.

8 Delivery and Installation

8.1 Contractor Project Team - C

Commnet Response:

Once the contract is awarded a SPOC will be assigned to this project through the completion of construction. Should the SPOC be changed for issues beyond our control every effort will be made to replace SPOC with equivalent resume and GCUSD will be consulted on replacement candidates as much as employment laws allow.

8.2 Site Preparation Documentation – C

Commnet Response:

Have read and will comply.

8.3 Delivery - C

Commnet Response:

Have read and will comply.

8.4 Unpacking, Inspection and Installation - C

Commnet Response:

Have read and will comply.

8.5 Contractor On-Site Support – C

Commnet Response:

Have read and will comply.

9 Maintenance, Warranty and Repair

9.1 Contractor Help Desk Operation – C

Commnet Response:

Have read and will comply.

9.2 Help Desk Call Back – C

Commnet Response:

Have read and will comply.

9.3 Warranty Start – C

Commnet Response:

Have read and will comply.

9.4 Warranty Period – C

Commnet Response:

Have read and will comply.

10 Experience, Certifications and Insurance

10.1 General Experience - C

Commnet Response:

Commnet is a wholly owned entity of ATN International which has been in the telecommunications business for over 20 years, on a public exchange (NASDAQ: ATNI), and has a market capitalization in excess of \$1B. ATNI currently owns and operates substantial telecom assets in the US, primarily in rural America, and as well as other countries including fiber optic cable. All financial reports and asset listings can be found on our investor relations website at ir.atni.com.

Notably, Commnet, as a subcontractor to its affiliate NTUA Wireless, is currently constructing a similar fiber network for the Apache County School Consortium. Therefore, Commnet looks forward to leveraging its experience from that project to make this project a success.

10.2 Insurance - C

Commnet Response:

Have read and will comply. Possible exception to last item, as COO only needed if full shelter installed. Customer must have COO for School already in place.

10.3 Contractor Information - C

Commnet Response:

Refer to responses 6.3.1 and 10.1

10.3.1 Contractor Years in Operation - C

Commnet Response:

Refer to responses 6.3.1 and 10.1

10.3.2 References - C

Commnet Response:

Commnet is the Operating partner for NTUA Wireless, LLC in partnership with the Navajo Tribal Utility Authority. Therefore, Commnet has experience provisioning the type of services requested herein via the E-rate program – both discounted DIA services and E-rate special construction.



March 28, 2017

RE: Letter of Reference for NTUA Wireless, LLC ("NTUAW")

To whom it may concern:

On behalf of Winslow Indian Health Care Center ("WIHCC"), I am pleased to provide a letter of reference for NTUAW.

WIHCC and NTUAW have worked together since 2012 to bring much needed broadband connectivity to rural located health and wellness centers in Arizona. NTUAW worked diligently to construct a network that provides connectivity from our main hospital in Winslow to seventeen remote locations. This network has enabled WIHCC to bring quality healthcare options to the citizens of those areas. NTUAW has shown that it has the expertise needed to construct and deliver reliable broadband connectivity.

I encourage you to consider NTUAW for your broadband needs. If you have any questions, please do not hesitate to contact me at (928) 289-8050.

Sincerely,

Edison Joe, BS, MT(AIT)
Director of Information Technology
Winslow Indian Health Care Center
500 North Indiana Avenue
Winslow, Arizona 86047

500 North Indiana Avenue • Winslow, AZ 86047 • (928) 289-6244 • FAX (928) 289-3447 •
www.wihcc.com



CENTRAL CONSOLIDATED SCHOOL DISTRICT

Shiprock Administration Office
PO Box 1199
Shiprock, New Mexico 87420
Voice: (505) 368-4984 or (505) 598-9684
Fax: 505-368-5232

Weaving Ancient Wisdom and Modern Knowledge

February 10, 2015

To Whom It may concern:

Central Consolidated Schools contracted with NTUA Wireless in March 2014 to provide Naschitti Elementary School with 10MB of Internet bandwidth. We scheduled the installation for June and NTUA was able to complete the installation in a timely matter. Their Internet support people connected their equipment with our existing Cisco routers and firewalls. They also worked with my technicians to provide the full bandwidth and it has been extremely reliable.

In January of this year we contacted NTUA to move their equipment into our new school at Naschitti. Again they were very quick and professional and we have not have problems or down time in our service.

If you have any questions or need any additional information, please contact me at 505-598-3699 and I will be glad to answer any questions that you have.

Sincerely

Rick Nussbaum
Tech Support Coordinator
Central Consolidated School District*



February 11, 2015

To Whom It May Concern:

RE: Letter of Reference for Navajo Tribal Utility Authority-Wireless and Internet Services

On behalf of Kayenta Unified School District (KUSD), it is my pleasure to provide a letter of reference for the internet and wireless services provided by Navajo Tribal Utility Authority (NTUA) - Wireless.

Since July 1, 2014, the KUSD Technology staff has been working collaboratively and cooperatively with NTUA-Wireless. NTUA-Wireless has provided excellent and quality services at a reasonable cost. KUSD has increased their bandwidth and NTUA Wireless has continued to monitor and support any concerns that may arise. The internet access allows for unlimited access throughout our district for staff, students and parents. In addition, we have experienced limited down time during the school or work day.

Please consider Navajo Tribal Utility Authority (NTUA) - Wireless for your internet and wireless services. KUSD will continue to work with NTUA Wireless in the next few years due to the optimal services they provide.

If you have any questions or need further clarification, please contact me at (928) 697-2062.

Sincerely,

Vangie Bradley-Wilkinson
Associate Superintendent of Support Programs
Kayenta Unified School District

11 Other

11.1 Force Majeure - C

Commnet Response:

Have read and understand

11.2 Indemnification - C

Commnet Response:

Have read and understand

11.3 Arizona Conflicts of Interest - C

Commnet Response:

Have read and understand.

11.4 Other Arizona Statute - C

Commnet Response:

Have read and will comply. Respondent certifies it is not currently engaged in a boycott of Israel and will not engage in a boycott of Israel during the term of this Contract.

11.5 Legal Representation – C

Commnet Response:

Have read and understand

Appendix A: MRC/NRC Cost Table

Option 1: Internet plus Transport Bundled

Bandwidth	Eligible Monthly Recurring Cost	Ineligible monthly recurring cost	Eligible install/non-recurring cost	Ineligible install/non-recurring cost
50 Mbps	\$1,400.00			
100 Mbps	\$2,750.00			
200 Mbps	\$3,000.00			
300 Mbps	\$4,580.00			
400 Mbps	\$6,035.00			
500 Mbps	\$7,510.00			
600 Mbps	\$9,000.00			
700 Mbps	\$10,510.00			
800 Mbps	\$12,500.00			
900 Mbps	\$14,000.00			
1 Gbps	\$15,950.00			

Option 2: Transport Only

Bandwidth	Eligible Monthly Recurring Cost	Ineligible monthly recurring cost	Eligible install/non-recurring cost	Ineligible install/non-recurring cost
50 Mbps	N/A			
100 Mbps	N/A			
200 Mbps	N/A			
300 Mbps	N/A			
400 Mbps	N/A			
500 Mbps	N/A			
600 Mbps	N/A			
700 Mbps	N/A			
800 Mbps	N/A			
900 Mbps	N/A			
1 Gbps	N/A			

Option 3: ISP Only

Bandwidth	Eligible Monthly Recurring Cost	Ineligible monthly recurring cost	Eligible install/non- recurring cost	Ineligible install/non- recurring cost
50 Mbps	N/A			
100 Mbps	N/A			
200 Mbps	N/A			
300 Mbps	N/A			
400 Mbps	N/A			
500 Mbps	N/A			
600 Mbps	N/A			
700 Mbps	N/A			
800 Mbps	N/A			
900 Mbps	N/A			
1 Gbps	N/A			

Appendix B: Special Construction Pricing:

Description of Service	Strand Count	Mileage	Total Cost	Eligible Cost	Ineligible Cost
Internet/Transport to district hub	4	66.598	\$5,660,200.37	\$5,660,200.37	-

Cost Breakdown by type of plant:

	Construction costs	Design/Engineering	Total
Underground	\$1,291,224.34	\$11,248.60	\$1,302,472.94
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96 count fiber allocated at 1/24 (4 strands)

Loop to School in Aerial -estimated 2024 Linear Feet with entrance

Appendix C: Special Construction Schedule:

Project Activities	E-RATE FISCAL YEAR 2018-19								E-RATE FISCAL YEAR 2018-19							
	Q3 2018		Q4 2018		Q1 2019		Q2 2019		Q3 2019		Q4 2019		Q1 2020		Q2 2020	
FCDL/Contract Issued																
Right of Way/Engineering/Permitting																
Make Ready/Construction																
Network Commissioning/Turn Up																
Testing/Acceptance																

Appendix D: Commnet Authority to Provide Service:

CLEC Authority

- ARIZONA CORPORATION COMMISSION
 - DOCKET No. T-20966A-16-0135
 - IN THE MATTER OF THE APPLICATION OF COMMNET AZ, LLC FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY TO PROVIDE INTRASTATE TELECOMMUNICATIONS
 - Decision No. 75881
 - Order dated January 3, 2017
-
- USAC SPIN No. 143050194

STATE OF ARIZONA



Office of the CORPORATION COMMISSION

CERTIFICATE OF GOOD STANDING

To all to whom these presents shall come, greeting:

I, Ted Vogt, Executive Director of the Arizona Corporation Commission, do hereby certify that

*****COMMNET.AZ, LLC*****

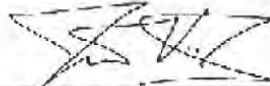
a foreign limited liability company organized under the laws of the jurisdiction of Delaware did obtain a Certificate of Registration in Arizona on the 22nd day of March 2016.

I further certify that according to the records of the Arizona Corporation Commission, as of the date set forth hereunder, the said limited liability company has not had its Certificate of Registration revoked for failure to comply with the provisions of A.R.S. section 29-601 et seq., the Arizona Limited Liability Company Act; and that the said limited liability company has not filed a Certificate of Cancellation as of the date of this certificate.

This certificate relates only to the legal authority of the above named entity as of the date issued. This certificate is not to be construed as an endorsement, recommendation, or notice of approval of the entity's condition or business activities and practices.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the Arizona Corporation Commission. Done at Phoenix, the Capital, this 23rd day of February, 2018, A. D.

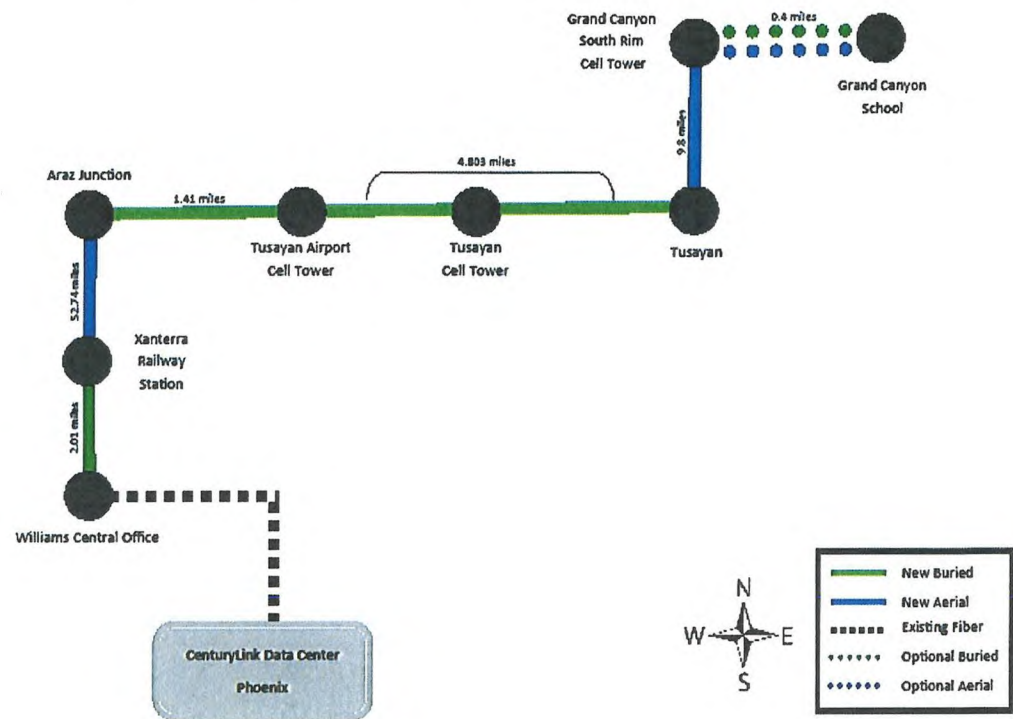



Ted Vogt, Executive Director

By: 1835615

Appendix E: Proposed GCUSD Fiber Route

Attachment A—Proposed GCUSD Fiber Routing



Appendix F: Team Fishel References and Resume



**Telecom & Broadband Communications
Customer References**



San Carlos Apache Telecommunications

Project: Fiber to the Home

Location: San Carlos, Arizona

Contact: Brent Kennedy

Telephone: (520) 475-9941

Value: \$2,317,543

Completion Date: June 2015

Installed 80,000-feet of mainline fiber optic cable and 110,000-feet of drop fiber to 760 homes.

AT&T Communications

Project: Engineering Pole Joint

Location: State of Ohio

Contact: Brent Cunningham

Telephone: (937) 296-7032

Value: \$2,213,412

Completion Date: December 2014

Field and transmitted proposals, redline prints, and draft in ARES. Beginning backlog of 7,600 and another 8,500 of new proposals were added.

Extenet Systems

Project: Las Vegas Strip WiFi

Location: Las Vegas, Nevada

Contact: Shawna Wilson-DesBois

Email: SDesbois@estenentsystems.com

Telephone: (623) 206-1335

Value: \$2,239,228

Completion Date: September 2014

Constructed underground fiber route along Las Vegas Boulevard from Spring Mountain Road to Reno Avenue, installed fiber optic cable (432 backbone) through new conduit system, installed 34 new nodes onto existing light poles, approximately 15,350-feet of horizontal directional drilling / trenched in 3 (1.25 HDPE conduits), (46) T-200 pull boxes, and (34) streetlight-mounted nodes with antennas. Project also included all fiber splicing, testing, node installation and activation, traffic control, barricades, permitting, night work, and complete restoration of work area upon completion.

Crown Castle USA Inc.

Project: Green Mountain DAS Installation

Location: Lakewood, Colorado

Contact: Steve Weingardt

Steve.Weingardt@crowncastle.com

Telephone: (805) 732-0576

Value: \$1,900,000

Completion date: March 2014

28 Node installation for a Distributed Antenna System.



**Telecom & Broadband Communications
Customer References**

**BEST
CHOICE**
SINCE 1936

CenturyLink

Project: Creech Fiber Build

Location: Las Vegas, Nevada

Contact: Gary Pace

Gary.Pace@centurylink.com

Telephone: (636) 887-4753

Value: \$2,719,257

Completion date: March 2014

Installed 34.3-miles of buried plant and 26.5-miles of conduit

Zayo Broadband

Project: Las Vegas Sprint DFTT

Location: Las Vegas, Nevada

Contact: David Barbee

david.barbee@zayo.com

Telephone: (702) 337-1723

Value: \$4,178,752

Completion date: March 2014

Installed 482,104-lateral feet of fiber optic cable for 91 distinct laterals and (4) distinct rings by means of new underground construction, new aerial installation and pulling through existing telephone infrastructure.

The Walsh Group

Project: San Gabriel Fiber Optic Relocation

Location: San Gabriel, California

Contact: John Maranowicz

Telephone: (312) 563-5405

Value: \$2,342,800

Completion Date: December 2013

Alameda Transportation Corridor Fiber Relocation – Trenched approximately 10,000-feet to place (12) 1.25-inch HDPE Conduits, (6) 1.5-inch HDPE and (2) 4-inch HDPE.

ENMR Plateau

Project: Fort Sumner Fiber to the Home

Location: Fort Sumner, New Mexico

Contact: Regan Williams, Project Manager

Telephone: (575) 389-5100

Value: \$2,000,000

Completion Date: July 2013

Installed 17-miles of buried fiber backbone and 16-miles of drop cable.



Telecom & Broadband Communications Customer References

**BEST
CHOICE**
SINCE 1936

North County Transit District

Project: Oceanside to Orange County

Location: Oceanside, California

Contact: Ramona Edwards

REdwards@nctd.org

Telephone: (760) 967-2826

Value: \$1,550,518

Completion date: June 2013

Sub / Prime: Prime

Trenched in 4,317-feet of 4-inch PVC along railroad tracks from Oceanside to Orange County, crossed the track 7 times. Also, pulled in 310,000-feet of 24-count and 65,000-feet of 72-count and installed 10 hand holes.

ENMR Plateau Telecommunications

Project: Fiber to the Home

Location: Santa Rosa, New Mexico

Contact: Regan Williams

Telephone: (575) 389-4378

Value: \$2,866,843

Completion date: June 2013

Sub / Prime: Prime

Installed 27-miles of fiber backbone and 20-miles of fiber dropped to 900 homes.

AT&T / Walsh Construction

Project: San Gabriel Trench

Location: San Gabriel, California

Contact: Matthew Redfern

mredfern@walshgroup.com

Telephone: (312) 735-8132

Value: \$2,242,405

Completion date: May 2013

Sub / Prime: Sub

Installed, encased, and backfilled approximately 2-miles of (6) 2-inch conduit for SPRINT, (12) 1.25-inch and (6) 1.5-inch inner duct for Level 3 Communications, and (1) 4-inch conduit for U.P.R.R. Installed vaults for SPRINT, Level 3 Communications, and U.P.R.R.

Penasco Valley Telecommunications

Project: Penasco Valley Hondo Fiber

Location: Hondo, New Mexico

Contact: Laura Weddige

Telephone: (575) 748-1241

Value: \$2,995,602

Completion Date: August 2012

Installed 29-miles of HDPE and fiber optic cable in southeastern New Mexico for RUS Engineer Mid State Consultants.



Telecom & Broadband Communications
Customer References

**BEST
CHOICE**
SINCE 1936

AT&T Communications

Project: Blythe to Alpine Fiber Placing

Location: Blythe, California

Contact: Rosemary Hammill

Telephone: (916) 799-4642

Value: \$3,300,000

Completion date: June 2012

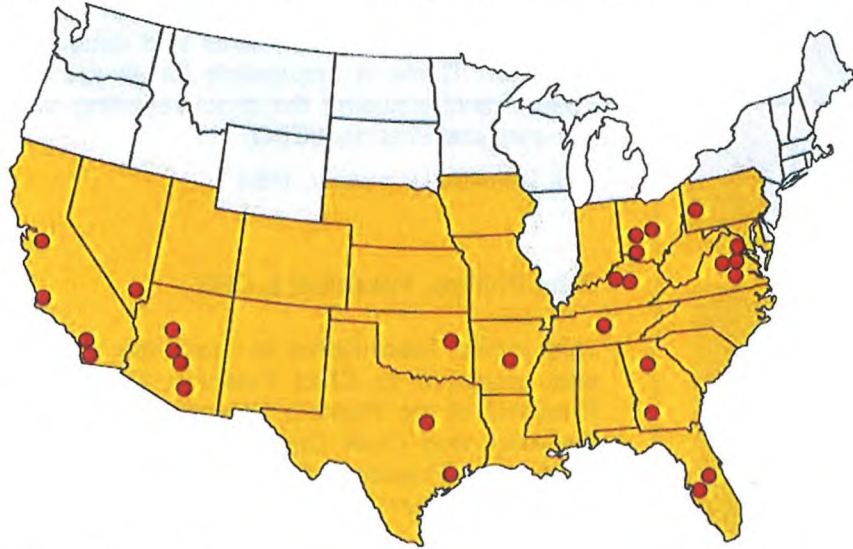
Sub / Prime: Prime

Placed 199 miles of fiber, 173 miles in existing conduit along Highway 78, I-8 and old Highway 80. New construction on the northend – plowing 22 miles and 4 miles of directional drilling, all new conduit is (6) 1 ½" HDPE. Also placed 54 handholes, 9 manholes, and entered 165 existing handholes. Storm water prevention and re-seeding are also included.

Building It Better for 80 Years



Ken Fishel founded The Fishel Company in 1936 with our first office Columbus, Ohio. Today, Team Fishel specializes in utility engineering, construction, installation, and maintenance services for broadband communications providers, natural gas and electric utilities with 1,850 Teammates and 37 offices in 13 states across the United States.



Mission Statement

Our mission is to be the best choice for utility engineering, construction, installation, and maintenance services for our Customers, Teammates, and Suppliers.

Our Value Proposition

We deliver the BEST value, on-time SOLUTIONS and meet our Customer's NEEDS and project specifications.

**Executive
Management
Team**

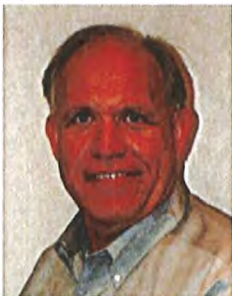


Following is our executive management team that represents over 260 years of experience. We take great pride in the talent of our Teammates and build upon it by promoting from within.

Diane Fishel Keeler, Chairman

Diane has been actively involved with Team Fishel and its operations throughout her life as an owner and daughter of founder, Ken Fishel. As Chairman, Diane is responsible for all executive management aspects of Team Fishel including the direct reporting relationships with the Board of Advisors and President/CEO.

B.S. Denison University, 1964



John Phillips, President & CEO

John joined Team Fishel as Corporate Controller in 1983. In 1989, John was promoted to Chief Financial Officer. He was promoted to Vice President of the Western Region in 1992, to the office of Executive Vice President and Chief Operating Officer in 1998, and then to his current position as President & CEO in 2001. John also sits on the Board of Advisors for Team Fishel and Capital University.

B.S. Capital University, 1980

M.B.A. Capital University, 1985

Workingman's PhD, 33 Years of Service



Randy Blair, Executive Vice President & Chief Operating Officer

Randy joined Team Fishel in June 1976 as a laborer in Dayton, Ohio. He was promoted to several positions including Foreman, Supervisor, and Area Manager. In April 1998, Randy was promoted to Vice President Central Region. In January 2009, Randy was promoted to Executive VP and Chief Operating Officer.

Workingman's PHD, 39 Years of Service



Scott Homberger, Vice President, Midwest Region

Scott joined Team Fishel in June 1975 as a laborer in the Dayton, Ohio area. He was promoted to Operator, Foreman and Supervisor before being named Columbus Area Manager in 1989. In April 1998, Scott was promoted to the office of Vice President, Midwest Region.

Workingman's PHD, 40 Years of Service



**Bill Pauley, Vice President, Western Region**

Bill joined Team Fishel in 1976 as a laborer in our Cincinnati, OH office. He was quickly promoted to Operator, Foreman and then transferred to Phoenix, Arizona as the Supervisor and subsequently Area Manager. In April 1998, Bill was promoted to his current position of Vice President, Western Region. In 2005, Bill was awarded the NUCA Ditch Digger of the Year award for the State of Arizona.

Workingman's PHD, 39 Years of Service

**Paul Riewe, Vice President & Chief Financial Officer**

Paul joined Team Fishel in December 1991 as Corporate Controller. His responsibilities include finance, accounting, purchasing, information systems and risk management. Paul was promoted to Vice President and Chief Financial Officer in January 2001. Prior to joining Team Fishel, Paul worked for Deloitte for 6 years.

B.A. Ohio State University, 1985

M.B.A. Ohio State University, Fisher College of Business, 2000

Workingman's PHD, 24 Years of Service

**Scott Keeler, Vice President, Central Region**

Scott joined Team Fishel in August 1994 as a Safety Coordinator for the Southeast Region in Atlanta. He has served as a Division Manager for the Denver Operations; Supervisor, Estimator, Director of Business Development in Dallas, and Area Manager in Indiana. He was promoted to Vice President of Florida in June 2004 and VP Central Region in 2009. Scott also manages Team Power Group, an operating subsidiary of The Fishel Company.

B.S. Miami University, 1993

Workingman's PHD, 21 Years of Service

**Vance Mauldin, Vice President, Southeast Region**

Vance joined Team Fishel in May 1993 as a Supervisor in Georgia. He later moved to Nashville, Tennessee as a Project Manager before relocating to Central Florida. In 1998, Vance was promoted to Division Manager and Area Manager in 1999. He was promoted to his Regional Manager of Florida in 2001 and received the Gray Eagle Award for Outstanding Performance and Leadership Development. In 2010, Vance again received the Gray Eagle Award.

Workingman's PHD, 21 Years of Service

**Ken Katz, Vice President, Low Voltage Technology Solutions Group**

Ken joined Team Fishel in March 2001 as the Director of Information Services. Ken is currently responsible for managing the Kentucky Operations, Low Voltage Technology Solutions Group, Columbus FiberNet, MetroDuct Systems, and Dublink Development, LLC. Ken also sits on the board of advisors for the American Red Cross of Greater Columbus.

B.S. Ohio State University, 1989



Fiber Network Services



Over the last 80 years, Team Fishel has become a standard for quality construction services for the broadband communications industry. With our focus on developing high performance Teammates and our commitment to deliver best value solutions for our telecom and cable TV Customers, Team Fishel has built long-standing relationships with the leaders in the industry.

From preliminary route selection for fiber backbone rings and last mile lateral extensions to feasibility studies and cost modelling, we have partnered with our Customers to help them provide complete network solutions for their broadband subscribers and commercial end users. From conceptual design to network construction, cable installation, and on-going maintenance, Team Fishel is the best choice for the lowest total cost solution

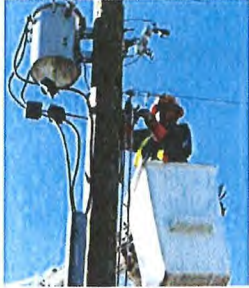
Our service capabilities include:

- Underground conduit construction
- Aerial cable placement & pole setting
- Fiber-to-the Home Networks
- Conduit Rodding, cleaning and cable pulling
- Fiber optic cable installation and splicing
- Plowed, trenched cable
- Manhole/handhole placement
- Directional drilling / case boring

Partial Client List

- AT&T Communications
- Brighthouse Networks
- Calaveras Telephone
- CenturyLink
- City of Dublin, Ohio
- Cox Communications
- Crown Castle USA
- Eastern New Mexico Rural Plateau Telecommunications
- ExteNet Systems
- FiberLight Communications
- Lighttower Communications
- Insight Communications
- La Jicarita Telephone
- Level (3) Communications
- Louisville Metro Government
- Penasco Valley Telecommunications
- Smart City Telecom
- Southeastern Indiana Telephone
- San Carlos Apache Telecommunications
- Time Warner Cable
- Towercloud
- Verizon Business
- Verizon Wireless
- Zayo Group

Electric Transmission & Distribution Services



Over the last 50 years, Team Fishel has helped our electrical utility Customers drive cost out of their business. Today, we offer complete turnkey services from installations and terminations to cable replacement and emergency maintenance and repair.

Underground Residential Distribution

- Subdivision new construction
- Primary and secondary extensions
- Cable section replacement for faulty circuits in complete subdivisions
- 3-phase manhole and conduit installations/road bores
- Maintenance & Repair
 - Equipment relocation
 - Splice pit excavation / backfill
 - Raising / lowering URD equipment
 - Cable relocations
 - Pole install / removal

Overhead Transmission & Distribution Services

- Installations
- Terminations
- Maintenance

Partial Client List

- Alabama Power
- American Electric Power
- Arizona Public Service Company
- Arkansas Valley Electric Cooperative
- Baltimore Gas & Electric
- Blattner Energy / Lonestar Electric
- Brazos Electric Cooperative
- Centerpoint Energy
- Dayton Power & Light
- Dominion Virginia Power
- Entergy
- First Electric Cooperative
- Garland Power & Light
- LG&E Energy
- M&A Electric Power Cooperative
- National Grid
- NV Energy
- Ouachita Electric
- Oklahoma Gas & Electric
- Ozarks Electric
- Tampa Electric
- Western Farmers Electric Cooperative

Natural Gas Distribution Services



Team Fishel has been performing turnkey natural gas distribution work for more than 50 years. We have the tools, talent, and technical expertise to provide solutions for your toughest gas line distribution challenge whether it is for new construction or a move to accommodate new facilities.

We specialize in:

- Full scope design, engineering, construction and maintenance
- Distribution gas line work...steel or plastic
- Low and high pressure steel or plastic
- Hot TAPS, live tie-ins and residential service installation
- Relocation of gas line to accommodate road projects
- Installation and maintenance of metering systems
- Leak detection and encapsulation
- Certified welding
- Hydrostatic testing
- Directional boring, pipe pushing and tunneling
- 24-hour emergency repair

Our Gas Designers perform up-front meetings with land developers to determine gas use requirements, and develop detailed plans showing routing for new main gas lines and services. If new easements are necessary, right-of-way services are provided from one of the largest right-of-way groups in the industry. With 100% of Team Fishel's right-of-way agents being certified by the International Right-of-Way Association (IRWA), our Customers know that their right-of-way needs are professionally handled.

Partial Client List

- Atmos Energy
- Centerpoint Energy
- Columbia Energy / Nisource
- LG&E Energy
- Oklahoma Gas & Electric
- Vectren Energy

Low Voltage Technology Solutions



Team Fishel provides enterprise-wide, low voltage solutions including structured cabling systems, data center infrastructure and equipment installation, wireless networks and building security & automation. We have installed more than 16,000 communications networks for Customers in the healthcare, financial, education, manufacturing, logistics and government sectors.

Network Design & Consulting:

- Network Feasibility Studies
- Fiber Asset Management
- Structured Cabling Systems
- Local and Wide Area Networks
- Wireless Networks
- Security, Access Control, & Video Surveillance

Network Installation Services:

- Structured Cabling Systems
- Copper & Fiber Optic Splicing
- Wireless Access Point Installation

Network Maintenance and Repair Services:

- Grounding & Bonding
- Testing & Troubleshooting
- Emergency Restoration

Certified Value Added Resellers for:

- Belden
- Commscope SYSTIMAX & Uniprise
- Corning Cabling Systems
- Legrand Ortronics
- Leviton
- Panduit
- Nexans Berktek OASIS
- TE Connectivity
- Honeywell
- Bosch

Markets Served:

- Local, State, and Federal Government Agencies
- Colleges, Universities and Higher Education Research Institutions
- Manufacturing & Industrial Facilities
- Banking, Insurance & Financial Institutions
- Hospitals & Healthcare Providers
- Supply Chain Management / Transportation / Logistics

Industry Certifications:

- BICSI Registered Communications Distributor Designers (RCDD)

Utility Design & Engineering Services



Team Fishel's Professional Services Group identifies, develops, and incorporates engineering solutions for the telecommunications, electric, and gas industries. We provide franchise acquisition for communication service providers, GPS surveying for base mapping, route selection/verification, field engineering, computer-aided design for preparation of pre-construction drawings, right-of-way acquisition, permitting, pre-construction staking and utility locating.

Design & Engineering

- Route feasibility for aerial or underground construction in rural, urban or suburban environments
- Research the availability of lease, or purchase of existing conduit or dark fiber facilities
- Route selection and field engineering
- Utility relocation and design (government mandate)
- Joint use services and make-ready design recommendations
- Project management, scheduling and status reporting
- RFP preparation
- Site survey / preliminary design
- Municipal and civil representation to accomplish customer goals

Right-of-Way Acquisition

- Plan review
- Utility and title research
- Property valuations
- Document preparation
- Negotiations and acquisition
- Complete permit procurement services
- Due diligence studies
- Site acquisitions

Computer Aided Design (CAD) and Design Services

- AutoCAD, Civil3D, and Micro-Station
- Prepare utility design prints for construction
- Erosion control plans
- Easement exhibits and plats
- Permit prints and Traffic Control plans
- As-built documentation and manhole details

Survey / Land Services

- Registered Surveyors.
- GPS surveying
- Utility easement surveys
- Topographical surveys
- Construction staking
- Right of Way surveys
- ALTA, ASCM Surveys

Emergency Response & Storm Restoration



After a natural disaster, it is important to bring the community back to normal as soon as possible. Our electric utility Customers depend on Team Fishel to respond quickly when catastrophe strikes. We have a mobile pool of over 200 Teammates and equipment that stretches from Virginia to the California coastline enabling our crews to begin restoring services to the affected areas almost immediately.

Whether it's electric lines and poles devastated by hurricane winds along the coast or overhead distribution lines snapped under the weight of ice in the Midwest, our emergency responders are standing-by and ready to be on location in most cases within 24 to 48 hours.

Once on site, Team Fishel establishes a command center to act as a liaison between our Customer and our field crews. Working closely with our Customer contacts and local authorities, the command center coordinates the repair schedule, procures supplies for our crews, and provides daily updates on the status of the repairs. This coordinated effort helps our crews work safely and efficiently in often chaotic and dangerous conditions.

Master Service Agreements for Emergency Restoration:

- American Electric Power
- Baltimore Gas & Electric
- Centerpoint Energy
- Duke Energy
- Entergy
- Florida Power & Light
- Louisville Gas & Electric
- Pearl River Valley EMC
- Progress Energy
- Southern Company
- Tampa Electric
- Southwest Louisiana Electric Membership Cooperative
- SECO
- Westar Energy
- Western Farmers Electric Cooperative

Leading with a
Value of
**ACCIDENT
FREE**



Team Fishel treats safety as a profit center. We measure every truck accident, job damage, and Teammate injury to track the success of our safety program. By reducing incidents on the job, we are able to increase productivity and reduce unnecessary downtime on the job so that we can reduce our costs and help our customers drive cost out of their business.

The safety and health of every Teammate, visitor and member of the public are of prime importance to Team Fishel and its management team. The Company and its Officers are committed to safe design, construction, and operation with emphasis on the prevention of accidents and injuries.

All of our Teammates attend regular safety training classes and a competent person will always be on the job site. Safety is monitored daily by our full-time safety coordinators with field checks for safety compliance involving shoring, hard hats, vests, steel plates, and barricades.

Weekly tailgate safety meetings are held with all Teammates, and subcontractors. Tailgate meeting sheets are signed by all attendees, and if desired, a copy is given to our Customers. Man-hours worked with and without accidents are also tracked and copied to the customer. The prevention of accidents, injuries and occupational illnesses is good business.

1. All injuries and occupational illnesses can be prevented.
2. Each manager and supervisor is responsible for administering the accident prevention program and will be evaluated accordingly.
3. Each Teammate must follow safe work practices and methods for himself/herself, their fellow Teammates, and members of the public.
4. Safety performance reviews must be a continuing process.
5. Training is an essential element for a safe work site.
6. Injuries, unsafe practices and incidents, and near misses with injury potential must be investigated.

Team Fishel trains all our laborers, crew leaders, operators, foremen, and supervisors on the proper safety and installation techniques to ensure a safe worksite. We pride ourselves on our safety record and believe that it starts first with proper training. Following are a few of the Safety Training classes and certifications that we have in place:

- First Aid / CPR
- Confined Space Competent Person
- Excavations – Competent Person
- Commercial Driver Training



Exhibit 7

Funding Commitment Decision Letter, Funding
Year 2018

Funding Commitment Decision Letter

Funding Year 2018

Contact Information:

Stephanie Nicely
GRAND CANYON UNIF SCHOOL DIST
100 BOULDER ST
GRAND CANYON, AZ 86023
stephanie@nicelydoneconsulting.com

FCC Form 471: 181034007**BEN:** 143156**Wave:** 39**Application Nickname:** 18-GCUSD-IA

Totals

Total Committed	\$5,122,980.33
------------------------	-----------------------

What is in this letter?

Thank you for submitting your application for Funding Year 2018 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the funding statuses for the FCC Form(s) 471, Services Ordered and Certification Form, that you submitted and referenced above.

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying the full cost for the services you receive.
2. Review the [Children's Internet Protection Act \(CIPA\)](#) requirements and file the [FCC Form 486](#) (Service Confirmation and CIPA Certification Form). **The deadline to submit this form is 120 days from the date of this letter or from the service start date (whichever is later).**



BEN Name: GRAND CANYON UNIF SCHOOL DIST **FCC Form 471:** 181034007
BEN: 143156 **Wave:** 39

3. Invoice USAC

- **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
- **If your service provider(s) is invoicing USAC:** The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the [FCC Form 474](#), the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs. Every funding year, service providers must file an [FCC Form 473](#), the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
- **To receive an invoice deadline extension, the applicant or service provider must request an extension on or before the last date to invoice. If you anticipate, for any reason, that invoices cannot be filed on time, USAC will grant a one-time, 120-day invoice deadline extension if timely requested.**

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC,** visit the Appeals section in the [E-rate Productivity Center \(EPC\)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.
- **To request a waiver of the FCC's rules,** please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System \(ECFS\)](#). Include your contact information, a statement that your filing is a waiver request, identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).



Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake to assure that committed funds are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction of USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



BEN Name: GRAND CANYON UNIF SCHOOL DIST **FCC Form 471:** 181034007
BEN: 143156 **Wave:** 39

Funding Commitment Decision Overview

Funding Year 2018

Application Comments for FCC Form 471: #181034007

The applicant did not submit any RAL corrections.

Funding Commitment Decision Overview

Funding Request Number (FRN)	Service Provider Name	Amount Requested	Amount Committed	Status
1899065544	Commnet AZ, LLC	\$5,094,180.33	\$5,094,180.33	Funded
1899065545	Commnet AZ, LLC	\$28,800.00	\$28,800.00	Funded



BEN Name: GRAND CANYON UNIF SCHOOL DIST **FCC Form 471:** 181034007
BEN: 143156 **Wave:** 39

FRN 1899065544	Service Type Data Transmission and/or Internet Access	Status Funded
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Dollars Committed			
Monthly Cost		One-time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$0.00	Total Eligible One Time Charges	\$5,660,200.37
Total Pre-discount Charges		\$5,660,200.37	
Discount Rate		90.00%	
Committed Amount		\$5,094,180.33	

Dates		Service Provider and Contract Information	
Service Start Date	7/1/2018	Service Provider	Commnet AZ, LLC
Contract Expiration Date	6/30/2023	SPIN (498ID)	143050194
Contract Award Date	3/17/2018	Contract Number	18-01 A
Service Delivery Deadline	6/30/2019	Account Number	
Expiration Date (All Extensions)		Establishing FCC Form 470	180016780

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Funding Commitment Decision Comments

MR1: Approved as submitted.



BEN Name: GRAND CANYON UNIF SCHOOL DIST **FCC Form 471:** 181034007
BEN: 143156 **Wave:** 39

FRN 1899065545	Service Type Data Transmission and/or Internet Access	Status Funded
--------------------------	---	-------------------------

Dollars Committed			
Monthly Cost		One-time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$36,000.00	Total Eligible One Time Charges	\$0.00
Total Pre-discount Charges		\$36,000.00	
Discount Rate		80.00%	
Committed Amount		\$28,800.00	

Dates	
Service Start Date	7/1/2018
Contract Expiration Date	6/30/2023
Contract Award Date	3/17/2018
Service Delivery Deadline	6/30/2019
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	Commnet AZ, LLC
SPIN (498ID)	143050194
Contract Number	18-01 A
Account Number	
Establishing FCC Form 470	180016780

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Funding Commitment Decision Comments

MR1: Approved as submitted.

Exhibit 8

Form 500 Funding Commitment Adjustment
Request Form

18-GCUSD-1899065544 - #133230

Summary

Associated FRNs

Review Inquiries

News

Related Actions

In-Review

Outreach

Wave Ready

Committed

Funding Commitment Adjustment Request Form

▼ FCC Form 500 Details

View Status (-)

Status Your application is under review.**Funding Year** 2018**Submitting Organization** GRAND CANYON UNIF SCHOOL DIST
(BEN: 143156)**Created By** Stephanie Nicely**Created On** 2/19/2019 7:42 PM MST

▼ Main Contact

Name Derrick Tutt**Email** dtutt@grandcanyonschool.org**Phone Number** 928-638-2461

▼ Service Delivery Extension Request

FRN ↑	Application Number	Application Nickname	FRN Nickname	Category of Service	SPIN	SPIN Name
1899065544	181034007	18-GCUSD-IA	18-GCUSD-SC	Category 1	143050194	Commnet AZ, LLC

▼ Service Provider Questions

Was the service provider unable to complete delivery and installation for reasons beyond their control?

☒ YES ☐ NO

Was the service provider unwilling to complete delivery and installation after USAC withheld payment for more than 60 days on an invoice for those services?

☐ YES ☒ NO

View Supporting Documentation (-)

▼ Supporting Documentation

Document ID	Document	Description	Upload Stage	Uploaded By	Uploaded On
50720	GCUSD_Commnet_IA_18-23_CS.pdf	Contract with anticipated construction timeline.	Intake	Stephanie Nicely	2/8/2019 9:45 AM MST

DOWNLOAD AND PRINT

Exhibit 9
E-Rate Information Request

18-GCUSD-1899065544 - #133230

Pending Inquiries

Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date ↓	Due Date	Extn.	Status
------	--------	------	---------------	-------------	-------	---------	-----------------	----------	-------	--------

No Pending Inquiries.

CLOSE

Submitted Inquiries

Name	Outreach Type	Answered By	Assigned Date ↓	Answered Date
FCC Form 500	E-Rate Information Request	Stephanie Nicely	2/21/2019 7:09 AM MST	2/23/2019 6:19 PM MST

FCC Form 500

Issue

USAC's Client Operations team is currently reviewing your Implementation (Service Delivery) Extension request, and we have identified an issue that we need you to help us resolve.

What is the issue?

In your request for an implementation (service delivery) extension on the FCC Form 500, you indicated "The service provider was unable to complete delivery and installation for reasons beyond the service provider's control." This is an issue because additional information regarding the circumstances that were beyond the service provider's control is required.

Question(s)

This page will timeout after an extended period of inactivity. Please periodically save your work using the 'Save & Close' button below. You may then use your browser's 'Back' button to return to your work.

Your response to Client Operations' questions:

#	Question	Response
1	Please describe in detail the circumstances that were beyond the service provider's control.	This project was expected to require 24 months to complete from the start, as indicated in the original proposal. The lengths of the fiber build - approximately 67 miles - combined with the remoteness of the location make this a difficult build under normal circumstances. Because the school is within a National Park (The Grand Canyon), various federal agencies must be involved - National Forest Service, National Park Service - in addition to the towns of Tusayan and Williams through which the fiber will run. Due to the cost to navigate of all of these requirements coupled with the uncertainty of E-Rate funding approval, none of these activities could begin before FCDL. The FCDL date is 1/3/2019. The Service Provider will endeavor to have the project complete and service delivered by their originally stated July 1, 2020 date but the 6 month delay in funding approval has made it impossible to meet the July 1, 2019 completion deadline.
2	If you would like to provide any additional information about these issues that have not been addressed above: Use the text box to type information, or upload additional documentation using the "Browse" button.	Attached is the original quote that stated this would be a 24 month build.

If you would like to provide any additional information about these is... ▼

CLOSE

> Deactivated Inquiries

10/10/2020

2

10/10/2020

10/10/2020

10/10/2020

2

Exhibit 10

Revised Funding Commitment Decision Letter

Revised Funding Commitment Decision Letter

Funding Year 2018

Contact Information:

Stephanie Nicely
GRAND CANYON UNIF SCHOOL DIST
100 BOULDER ST
GRAND CANYON, AZ 86023
stephanie@nicelydoneconsulting.com

BEN: 143156**Post Commitment Wave:** 20

Totals

Original Commitment Amount	\$5,094,180.33
Revised Commitment Amount	\$5,094,180.33

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2018 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- FCC Form 500 - Service Delivery Extension Request

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. **File the FCC Form 486**, Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).



BEN Name: GRAND CANYON UNIF SCHOOL DIST

BEN: 143156

Post Commitment Wave: 20

- o **If USAC approved funding on an FRN in your original FCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).
 - o **If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
- **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
 - **If your service provider(s) is invoicing USAC:** The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the [FCC Form 474](#), the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs. Every funding year, service providers must file an [FCC Form 473](#), the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
 - **To receive an invoice deadline extension, the applicant or service provider** must request an extension on or before the last date to invoice. **If you anticipate, for any reason, that invoices cannot be filed on time**, USAC will grant a one-time, 120-day invoice deadline extension if timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC**, visit the Appeals section in the [E-rate Productivity Center \(EPC\)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.
- **To request a waiver of the FCC's rules or appeal USAC's appeal decision**, please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System](#) (ECFS). Include your contact information, a statement that your filing is a waiver request,



BEN Name: GRAND CANYON UNIF SCHOOL DIST
BEN: 143156
Post Commitment Wave: 20

identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



BEN Name: GRAND CANYON UNIF SCHOOL DIST

BEN: 143156

Post Commitment Wave: 20

Revised Funding Commitment Decision Overview

Funding Year 2018

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1899065544	Commnet AZ, LLC	FCC Form 500 - Service Delivery Extension Request	\$5,094,180.33	Denied



BEN Name: GRAND CANYON UNIF SCHOOL DIST
BEN: 143156
Post Commitment Wave: 20

Post Commitment Request Number: 133230	Post Commitment Request Type: FCC Form 500 - Service Delivery Extension Request	Post Commitment Decision: Denied
--	--	--

FRN: 1899065544	Service Type: Data Transmission and/or Internet Access	Original Status: Funded	Revised Status: Funded
FCC Form 471: 181034007			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$0.00	Total Eligible One Time Charges	\$5,660,200.37
Total Pre-Discount Charges		\$5,660,200.37	
Discount Rate		90.00%	
Revised Committed Amount		\$5,094,180.33	

Dates	
Service Start Date	7/1/2018
Contract Expiration Date	6/30/2023
Contract Award Date	3/17/2018
Service Delivery Deadline	6/30/2019
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	Commnet AZ, LLC
SPIN (498ID)	143050194
Contract Number	18-01 A
Account Number	
Establishing FCC Form 470	180016780

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Revised Funding Commitment Decision Comments:
--

Post Commitment Rationale:
Per the FCC decision in the Second E-rate Modernization order, applicants may receive up to a one-year extension to complete special construction and use the fiber if they can demonstrate that construction was unavoidably delayed. This FCC rule does not allow approval for the reason submitted.

Exhibit 11
Appeal

Records Appeals

Appeal_GCUSD_2018_Form 500 133230 - #134830

Summary

Associated FRNs

Review Inquiries

News

Related Actions

In-Review

Outreach

Wave Ready

Committed

▼ Appeal Information

View Status (-)

Status Your application is under review.**Funding Year** 2018**Submitting Organization** GRAND CANYON UNIF SCHOOL DIST
(BEN: 143156)**Created By** Nicely Done Consulting NDC**Created On** 4/17/2019 8:19 PM MST

▼ Main Contact

Name Ernest Nicely**Email** ej@nicelydoneconsulting.com**Phone Number** 623-780-5737

▼ Narrative

FCC Form 500 # 133230 was submitted on 2/19/2019 to extend the service delivery deadline for FRN 1899065544 which is to provide fiber Internet service to the Grand Canyon Unified School District, located in the Grand Canyon, Arizona.

There are many factors contributing to the need for an extension of the delivery deadline but the primary factor is the late FCDL of 1/3/2019. Because of the high cost of the project no work could begin until after Funding Approval and 6 months is not enough time to deliver fiber to the Grand Canyon.

Per the USAC website - FAQs: Eligible Fiber Services, Question #7 - <https://www.usac.org/sl/about/faqs/faqs-fiber.aspx>

A7: Applicants may request a one-year extension to complete special construction and light the fiber (or use the self-provisioned network if another technology is employed), if the applicant can demonstrate that construction was unavoidably delayed due to weather or other reasons. Examples of circumstances that may be an unavoidable delay include:

- Unforeseen weather event or pattern resulting in saturated or frozen ground that prevents the work from occurring;
- Occurrence of a natural disaster;
- Scheduled delivery of required plant components does not arrive;
- USAC issues an FCDL too late for the applicant to complete special construction and light the associated fiber by the end of the funding year;
- Another unforeseeable, unavoidable event.

Even if no other factors are considered, the late FCDL alone is reason enough to extend the service delivery deadline for FRN 1899065544, per USAC policy.

Please extend the deadline to June 30, 2020 to allow the district to utilize the E-Rate and State Matching funds that were originally approved. This school district has been unable to acquire more than 10Mbps Internet service to support 300 students until now. To decline this funding now, after having already approving it in full, because of the delayed review process would be unfair to the district and its students.

▼ Appeal Details

Decision appealed by applicant Revised Funding Commitment Decision Letter

If you wish to modify or cancel your appeal, or, if you have any questions about your appeal, please contact the E-rate Program's Client Service Bureau (CSB) at (888) 203-8100.

View Supporting Documentation (-)

▼ Supporting Documentation

Document ID	Document	Description	Upload Stage	Uploaded By	Uploaded On
53965	18-GCUSD-1899065544 - #133230.pdf	Form 500 submission in portal	Intake	Nicely Done Consulting NDC	4/17/2019 8:20 PM MST
53967	GRAND CANYON UNIF SCHOOL DIST Funding Commitment Decision Letter IA.pdf	FCDL for Application 181034007	Intake	Nicely Done Consulting NDC	4/17/2019 8:20 PM MST

53966

GRAND CANYON UNIF
SCHOOL DIST Revised
Funding Commitment
Decision Letter.pdf

RFCDL - Denial of
Extension Request

Intake

Nicely Done Consulting
NDC

4/17/2019 8:20 PM MST

Exhibit 12

June 6, 2019 Letter to USAC



June 6, 2019

USAC

Schools and Libraries Division - Correspondence Unit

Re: **Billed Entity:** Grand Canyon Unified School District
Billed Entity Number (BEN): 143156
Funding Year: 2018
471 Application Number: 181034007
FRN: 1899065544
FCDL Date: 01/03/2019

Supporting Documentation for Appeal # 134830
Request for Extension of Service Delivery Deadline

To Whom It May Concern:

The Grand Canyon Unified School District requests an extension of the Service Delivery Deadline for FY 2018 Funding Request Number 1899065544. Construction of the fiber network has been unavoidably delayed due to reasons and circumstances beyond the control of the district and the service provider (Commnet AZ, LLC). According to USAC rules:

Applicants may request a one-year extension to complete special construction and light the fiber (or use the self-provisioned network if another technology is employed), if the applicant can demonstrate that construction was unavoidably delayed due to weather or other reasons. Examples of circumstances that may be an unavoidable delay include:

- Unforeseen weather event or pattern resulting in saturated or frozen ground that prevents the work from occurring;
- Occurrence of a natural disaster;
- Scheduled delivery of required plant components does not arrive;
- USAC issues an FCDL too late for the applicant to complete special construction and light the associated fiber by the end of the funding year;
- Another unforeseeable, unavoidable event

This particular project has been delayed due to multiple unforeseeable events and weather that have affected the national park system and the Grand Canyon National Park, in particular, and the issuance of a late FCDL. For the reasons outlined below, Grand Canyon Unified School District respectfully requests that USAC extend the Service Delivery Deadline to June 30, 2020 to allow Commnet AZ to complete the installation and receive its committed E-Rate and Arizona State Matching Funds.

BACKGROUND

The Grand Canyon Unified School District is located in Grand Canyon Village within the Grand Canyon National Park and Kaibab National Forest. The district consists of two schools, including a High School, and approximately 300 students. GCUSD is the only K-12 school district in the country to reside within a national park.

Due to the fact that the district is in a remote national forest, in the middle of a national park, the school district has been unable to obtain more than 10.5Mbps Internet Service via bundled T1s. The National Park Service has also prohibited the construction of any structures to support microwave broadband services. The nearest town, Tusayan, is 6.5 miles away and also experiences a similar shortage of bandwidth options. The nearest town with any Internet service to speak of is Williams which is 60 miles away.

Grand Canyon Unified School District is currently using a bundled T1 service to achieve 10.5Mbps of Internet service. With 300 students that allows for an average of approximately 35Kbps per student, nearly 1/30th of the stated FCC bandwidth goal of 1Mbps per student. And at more than \$43K per year the district is paying more than \$4,000 per Mb before E-Rate, 100 times the national average.

In FY2018, Grand Canyon Unified School District applied for and obtained E-Rate funding for a 67-mile fiber build from Williams to the school district. The district also received \$566,020 in state funds and corresponding matching funds from USAC. Together, the district would receive the \$5,660,200 necessary to fund the project. The deadline for completion of the network is June 30, 2019. Because of the high cost for the construction neither the district nor the service provider could afford to begin the project until receiving E-Rate funding approval.

UNFORESEEABLE OR UNAVOIDABLE EVENT

The district and service provider have experienced *unforeseeable and unavoidable events*. As is widely known, the United States Federal Government shutdown from December 22, 2018 to January 25, 2019, the longest shutdown in history. Only employees in critical positions continued working which did not include Permitting and Right of Way Operations. The remaining park workforce was not available to assist the district with its fiber project. During the closure and for at least 45 days after reopening, all federal agency efforts were directed towards dealing with the backlog of work and requests. The district was informed that all items in process would be completed by order of reception, not by order of importance. This drastically curtailed any progress and forced the Grand Canyon Unified School District's E-Rate project to be placed on hold and lose valuable time towards completion. In addition to the park closure, the National Forest Service was

also shut-down. Because eighty percent of the distance to the Grand Canyon School District is located inside National Forest, the closure of the Forest Service also became a critical issue and has caused major time loss in the project. With these government closures we are only now beginning to receive the needed approvals in order to begin construction.

Prior to the Government shutdown, in October 2018, the park superintendent was placed under investigation for workplace violations. After the five-month investigation was concluded with no findings, the superintendent resigned her position in March of 2019. Since the start of the investigation the park has been led by interim superintendents, 10 interim superintendents in the eight months since the investigation began. Many of the acting superintendents were in that position for only two weeks. During this tumultuous period very little new business has begun. Decision making is at a standstill, especially decisions that may have long term effect, such as a fiber construction project.

UNFORESEEN WEATHER EVENT

Northern Arizona and the Grand Canyon area have experienced extreme weather events during the Winter and Spring. Extreme weather and snowfall from severe storms that caused closures of portions of the road between Williams and Tusayan, which is the main path for this project. And in February, Flagstaff, which is about 20 miles east of the Williams, experienced a single day record for snowfall during a 3-day blizzard which also affected the Grand Canyon, Williams and Tusayan. Continued poor weather during the Spring caused a rock slide, damaging the main water pipeline into the Grand Canyon. The extreme weather has increased the difficulty in reaching the break in order to begin the necessary repairs. The last five inches of snow fell on May 23, 2019.

Each of these events has caused the National Park Services to focus mainly on emergency services and day to day operations. Coupled with the intermittent leadership at the superintendent level, virtually no decisions have been made regarding permitting or new construction projects.

LATE FCDL

The Funding Commitment Decision Letter, approving the funding, was received on January 3, 2019, more than six months into the funding year. The only guidance provided on USAC's website simply states that an extension can be granted if, *USAC issues an FCDL too late for the applicant to complete special construction and light the associated fiber by the end of the funding year.* We submit that, even under the most favorable circumstances, there is no possible way to construct and light a fiber optic connection to the Grand Canyon in six months' time. The service provider must negotiate with federal and state transportation departments, the power company, the railway, two different towns, the National Forest Service and National Park Service before any work can begin. And, again, because of the high cost of this project and the unpredictability of E-Rate approval, no work could begin until after funding approval was granted.

Besides the obvious financial risk to the district and service provider, the US Forestry Service, National Park Service and Xanterra Rail Company would not allow the project to start without proper approved funding. The Standard Form 299 required for utility systems on federal lands requests a statement outlining the funding sources. Therefore, negotiations and engineering were

stalled pending the FCDL. An estimated 649 poles needed to be placed or replaced along this route. Therefore, this delay has pushed out the construction timeline past the end of the funding year.

CONCLUSION

For all of the reasons outlined above, the Grand Canyon Unified School District respectfully requests that the Service Delivery Deadline for Funding Request 1899065544 be extended to June 30, 2020. Granting this extension will allow the district to fully utilize the E-Rate and State funds as approved to provide its students with the bandwidth necessary to enable the digital learning experience required by today's curriculum. These schools, located in one of the most remote and grand locations in the country, have been severely underserved for years. This opportunity provided by E-Rate funding will bring this school district and the surrounding community up to the same standards available to most students throughout the country.

Thank you for your consideration,

Grand Canyon Unified School District #4
100 Boulder Street
Grand Canyon, AZ 86023

Exhibit 13

Revised Funding Commitment Decision Letter, July
24, 2019

July 24, 2019

Revised Funding Commitment Decision Letter

Funding Year 2018

Contact Information:

Stephanie Nicely
GRAND CANYON UNIF SCHOOL DIST
100 BOULDER ST
GRAND CANYON, AZ 86023
stephanie@nicelydoneconsulting.com

BEN: 143156**Post Commitment Wave:** 34

Totals

Original Commitment Amount	\$5,094,180.33
Revised Commitment Amount	\$5,094,180.33

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2018 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. **File the FCC Form 486**, Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).



BEN Name: GRAND CANYON UNIF SCHOOL DIST

BEN: 143156

Post Commitment Wave: 34

- o **If USAC approved funding on an FRN in your original FCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).
 - o **If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
- **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
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 - **To receive an invoice deadline extension, the applicant or service provider** must request an extension on or before the last date to invoice. **If you anticipate, for any reason, that invoices cannot be filed on time**, USAC will grant a one-time, 120-day invoice deadline extension if timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC**, visit the Appeals section in the [E-rate Productivity Center \(EPC\)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.
- **To request a waiver of the FCC's rules or appeal USAC's appeal decision**, please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System](#) (ECFS). Include your contact information, a statement that your filing is a waiver request,



BEN Name: GRAND CANYON UNIF SCHOOL DIST
BEN: 143156
Post Commitment Wave: 34

identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

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The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



BEN Name: GRAND CANYON UNIF SCHOOL DIST

BEN: 143156

Post Commitment Wave: 34

Revised Funding Commitment Decision Overview

Funding Year 2018

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1899065544	Commnet AZ, LLC	Appeals	\$5,094,180.33	Denied



BEN Name: GRAND CANYON UNIF SCHOOL DIST
BEN: 143156
Post Commitment Wave: 34

Post Commitment Request Number: 134830	Post Commitment Request Type: Appeals	Post Commitment Decision: Denied
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FRN: 1899065544	Service Type: Data Transmission and/or Internet Access	Original Status: Funded	Revised Status: Funded
FCC Form 471: 181034007			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$0.00	Total Eligible One Time Charges	\$5,660,200.37
Total Pre-Discount Charges		\$5,660,200.37	
Discount Rate		90.00%	
Revised Committed Amount		\$5,094,180.33	

Dates	
Service Start Date	7/1/2018
Contract Expiration Date	6/30/2023
Contract Award Date	3/17/2018
Service Delivery Deadline	6/30/2019
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	Commnet AZ, LLC
SPIN (498ID)	143050194
Contract Number	18-01 A
Account Number	
Establishing FCC Form 470	180016780

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Revised Funding Commitment Decision Comments:

Post Commitment Rationale:

FCC Rules related to the payment of support for discounted services establish deadlines for service providers to deliver services/products to the applicant. Under these rules, applicants can only receive E-Rate discounts for special construction charges related to leased lit or leased dark fiber if the fiber is lit by the end of the funding year (i.e., June 30). Similarly, special construction charges related to a self-provisioned network are only eligible for E-Rate support if the facilities are constructed and used by the end of the funding year. Applicants may request a one-year extension of the June 30 deadline to complete special construction and light the fiber, or use a self-provisioned



BEN Name: GRAND CANYON UNIF SCHOOL DIST

BEN: 143156

Post Commitment Wave: 34

network, if they demonstrate that construction was unavoidably delayed due to weather or other reasons. This process is documented on the USAC website at: <https://www.usac.org/sl/applicants/beforeyoubegin/fiber.aspx>. Although your appeal stated that you experienced extreme weather events during the winter and spring, your appeal failed to provide the information necessary to grant a one-year extension. The two-year term of your build is not an unavoidable delay for meeting the June 30 service delivery deadline, as the size and complexity of the build was known. Therefore, your appeal is denied.